

Banco
bs2.

CODE OF ETHICS

SENIOR MANAGEMENT MESSAGE

A company has a series of responsibilities towards its stakeholders, whether they are employees, customers, suppliers, shareholders, government, regulatory bodies or other interested parties. These, for their part, also have a series of expectations regarding the company.

As employees, we need to understand and comply with a series of procedures that guide the business - such as, for example, corporate values, principles and guidelines and legal orientation. It is in this context that a Code of Ethics becomes a great differential.

In addition to the security of operating in a serious, committed company, driven by values and consistent with legal principles, we also have the clarity of the limits of relations with the other publics with whom we interact on a daily basis.

At BS2, we have had a Code of Ethics since 2017. The novelty is that it has just been updated and, therefore, we invite everyone to take the time to delve into the content of the document. It provides guidelines for daily actions based on five principles: Conformity, Integrity, Transparency, Responsibility and Security.

Doing the right thing, the right way, reinforces our positioning. This allows a differentiable and sustainable performance by BS2, which is so dear to all kinds of businesses at the moment, as well as creates an alignment between what we preach internally and what we seek and deliver externally.

We count on you on this journey.



Marcos Grodetzky
Board Chairman



Marcos Magalhães
CEO

The guidelines of this
Code of Ethics

must be practiced
by **everyone**, both
in the national and
international sphere:



PRINCIPLES THAT GUIDE OUR DAY TO DAY

BS2 Bank is a signatory of the Global Compact, a United Nations initiative that calls on companies to act according to universal principles in the areas of **Human Rights, Labor, Environment and Anti-corruption**. By becoming signatory of the Global Compact, we reinforce our commitment to the sustainable development agenda, based on structuring elements for a more just, balanced and ethical society as well as our commitment to the planet and the people.

And this commitment can be materialized in **five principles** that guide our business conduct and which this Code is based on.



OUR PILLARS



01 Conformity

- › Conformity with Rules and Procedures
- › Prevention of Money Laundering and Financing of Terrorism



02 Integrity

- › Our commitment to ethical conduct
- › Internal and external fraud prevention
- › Diversity and Inclusion
- › Prevention of Corruption and Bribery
- › Combating Moral and Sexual Harassment



03 Transparency

- › Prevention of Conflict of Interest
- › Donations and Sponsorship
- › Gifts, Presents, Freebies, Travel and Hospitalities
- › Relationship with Stakeholders



04 Responsibility

- › Social and Environmental Responsibility
- › Ethics Channel



05 Security

- › Secrecy and Information Security
- › Non-compliance with Standards and Conduct
- › Privacy and Protection of Personal Data



01. CONFORMITY

Conformity with Rules and Procedures

All **BS2** companies must implement and follow the rules in force from regulatory and self-regulatory bodies of the financial market, as well as Brazilian and international laws that impact our business.

It is very important that you also know our Policies, Norms and Work Instructions that guide your actions. These documents are available in our document library named **Polaris**.

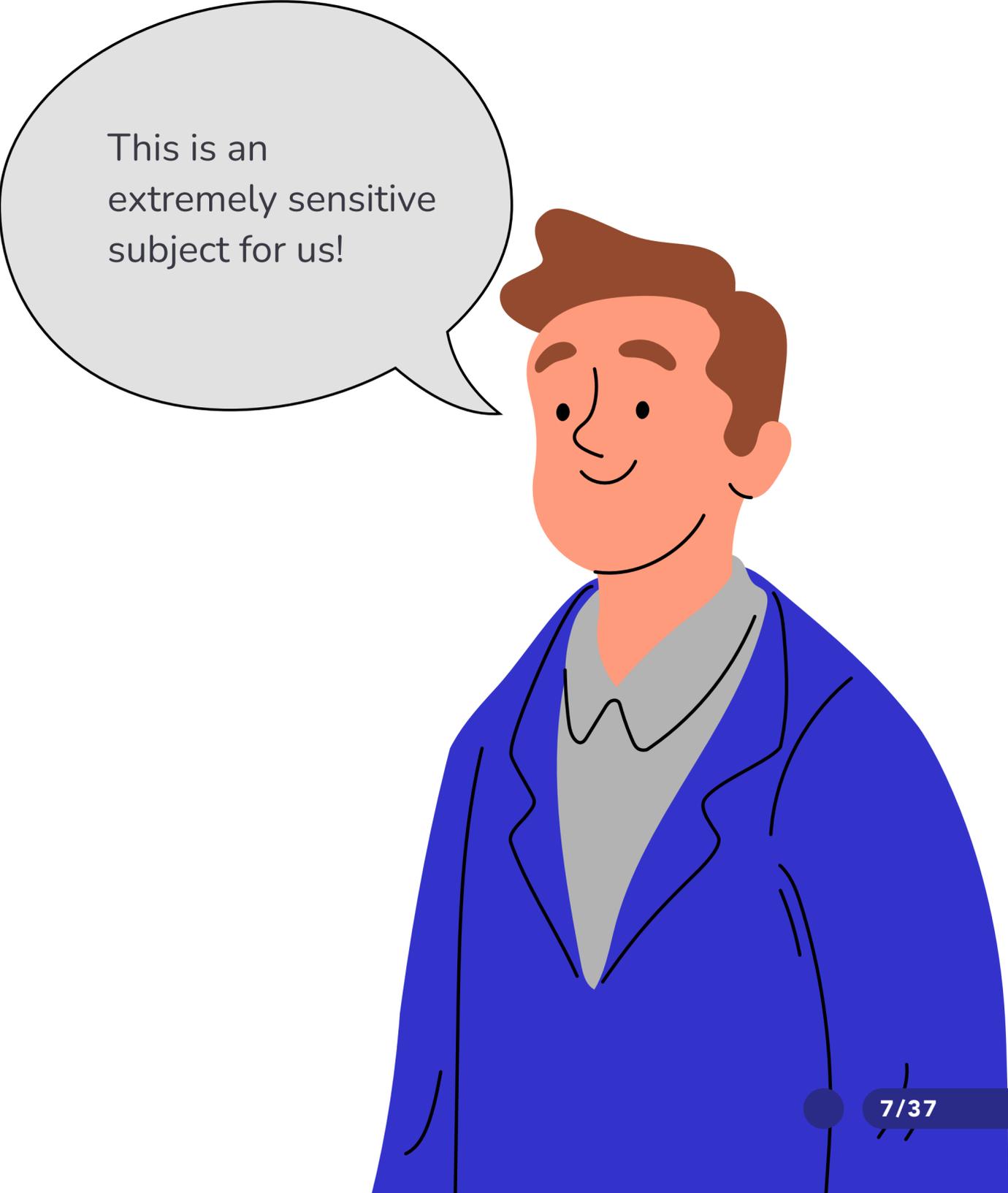




01. CONFORMITY

Prevention of Money Laundering and Financing of Terrorism

The companies of **BS2 Bank** have strict controls regarding the prohibition of transactions that have illegal activities by nature or destination. In addition, directors, leaders, employees, interns and third parties are trained and oriented regarding the institution's internal rules and procedures related to the Prevention of Money Laundering and Combating the Financing of Terrorism, provided for in its own policy.



This is an extremely sensitive subject for us!



02. INTEGRITY

Our commitment to ethical conduct

Ethics for **BS2** is unquestionable and, therefore, something that must be present in our choices and in our daily actions. Our thoughts, actions and decisions should always reflect this. It is on a daily basis that it must be practiced!



Change must start with each one of us. Let's be examples of Ethics and Integrity.



02. INTEGRITY

Prevention of Corruption and Bribery

In the **BS2** companies, it is **FORBIDDEN** to receive or offer any type of improper advantage to any person, whether national or international public authority or in the private sector.

We are committed to complying with Law 12.846/13, known as the Brazilian Anti-Corruption Law, and with all the other regulations that deal with this subject in other countries where we already do or are interested in doing business. Furthermore, we are signatory parties of the Business Pact for Integrity and Against Corruption, a public commitment in favor of integrity and against corruption, whose objective is to unite companies to promote a more honest and ethical market.

Learn more about our guidelines at [Prevention of Corruption and Bribery Policy](#).



Click on the QR Code and access!



Brazilian Anti-Corruption Law



Corporate Governance



02. INTEGRITY

Internal and external fraud prevention

It is the responsibility of all directors, leaders, employees, interns and outsourced service providers to act in the prevention and fight against internal and external fraud.

And how do we do that?

› Identifying in the course of your daily activities and communicating to the immediate superiors the weaknesses in the processes and systems that can be used as means to carry out internal and external frauds;

› Ensuring the implementation of mitigating controls and actions for the deficiencies that expose the area to fraud risk;

› Reporting through the Ethics Channel or directly to the second line of defense areas any suspicion or evidence of fraud that comes to your attention;

› Implementing and monitoring Key Risk Indicators in the critical activities of the area, investigating the deviations that occur and promoting corrective actions that restore the desirable standard. Actuating the second line of defense areas, when the deviation indicates suspicion of fraudulent action.

Learn more about these actions in [Fraud Risk Management Policy](#).

 Click on the QR Code and access!

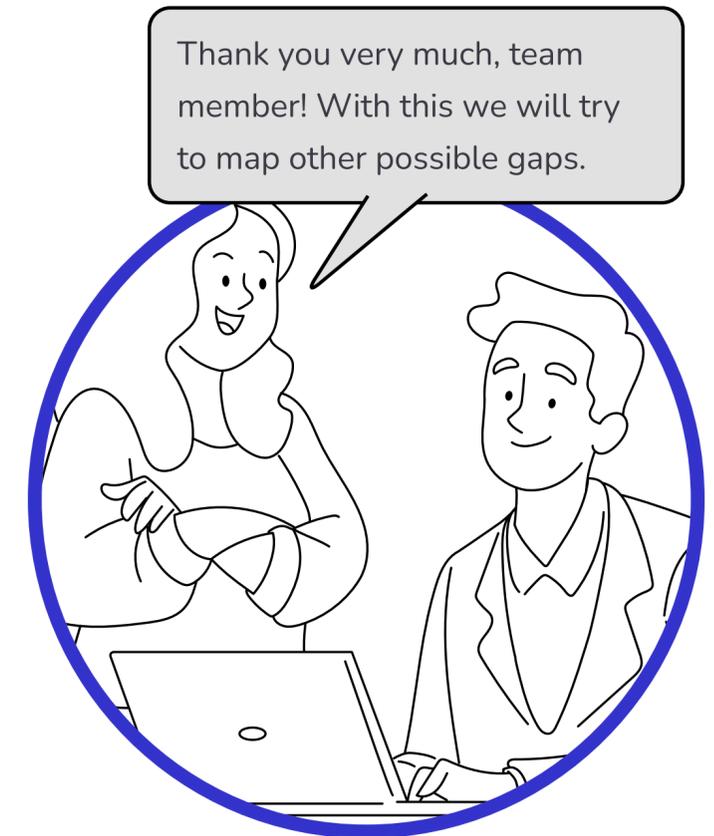
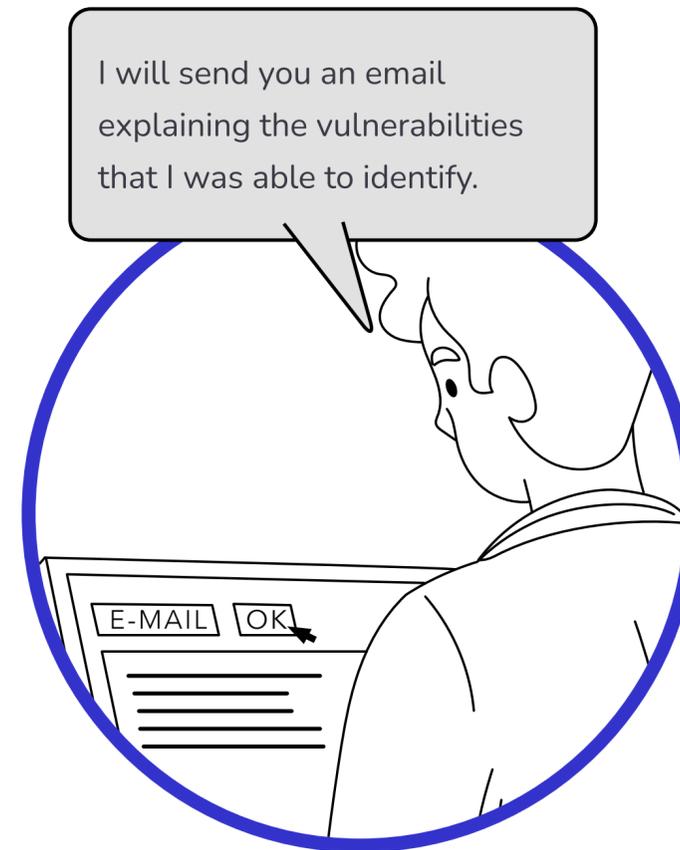
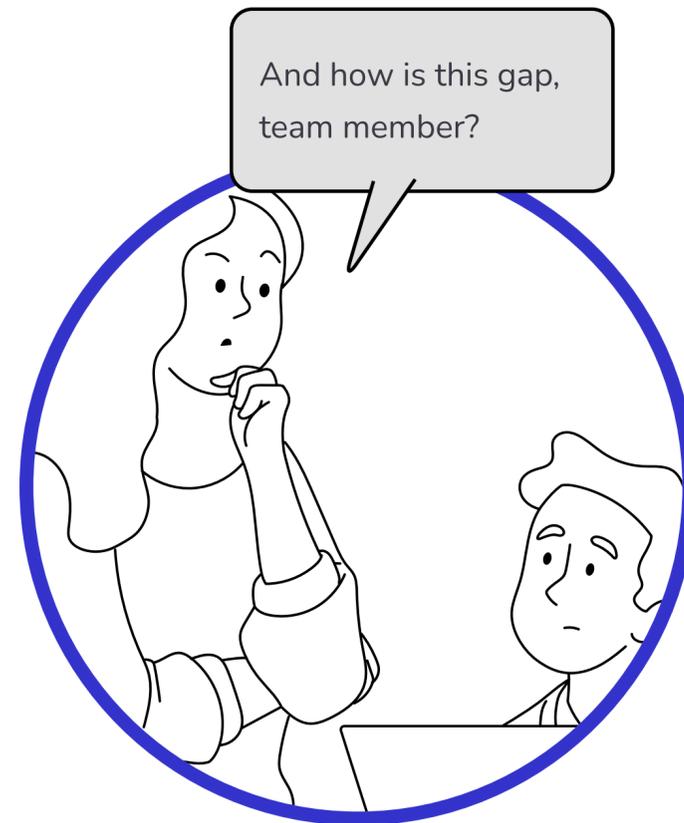


Corporate Governance



02. INTEGRITY

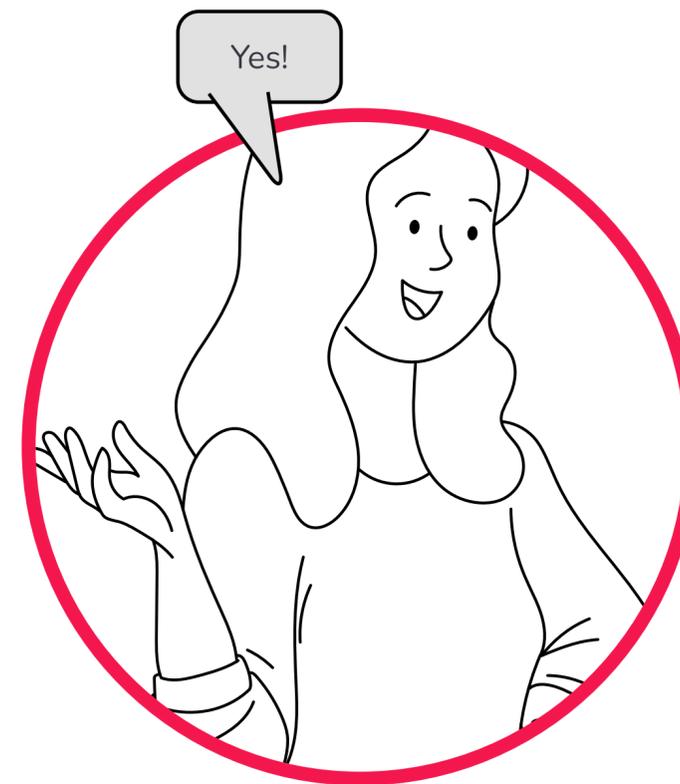
PROPER CONDUCT





02. INTEGRITY

IMPROPER CONDUCT





02. INTEGRITY

Combating Moral and Sexual Harassment and Discrimination

Any conduct that causes embarrassment, intimidation, threats, offenses, insults, physical punishment, humiliation and violations is unacceptable.

Likewise, any conduct that discriminates based on race, gender, religion, ideology, ethnic or social origin, sexual orientation, physical or psychological disability, appearance and/or age is prohibited.

Moral or sexual harassment and discrimination are intolerable and is also subject to administrative measures and punishable by law.

If you feel harassed or discriminated by someone (any person, no matter the position), don't be silent: talk to the Compliance team and report it on our [Ethics Channel](#).



Click on the QR Code and access!



Ethics Channel



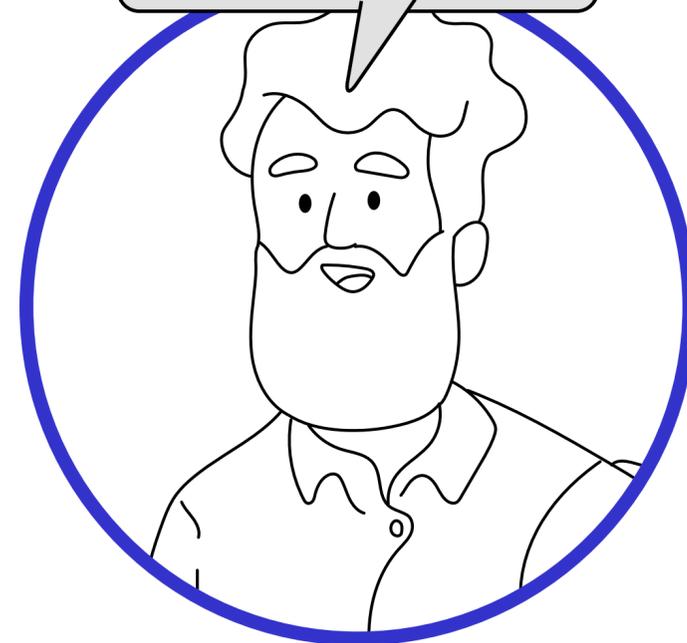
02. INTEGRITY

😊 PROPER CONDUCT

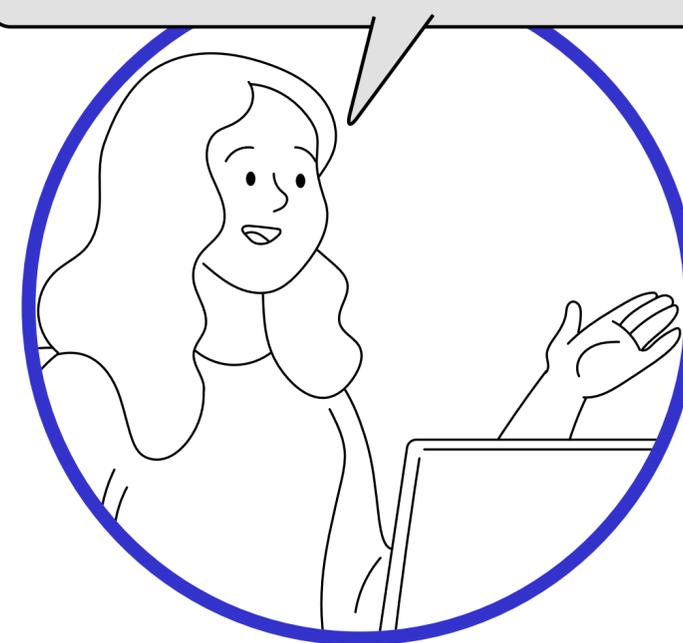
I've noticed that you always get uncomfortable every time we have a meeting with Manager X. Did something happen?



This manager always talks to me in an aggressive and unprofessional manner.



I want to help you. Perhaps the ideal is for you to use the **Ethics Channel** to find a way to improve this Manager X attitude.



Thank you very much, Leader. I will do this.





02. INTEGRITY

CONDUCTA INADEQUADA





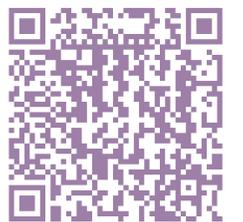
02. INTEGRITY

Diversity and Inclusion

We live in a multiple and diverse society where people are different. We understand it as a commitment of organizations to bring this multiplicity to the corporate space. In **BS2** companies we believe in the strength of this representation and we value an environment that is professionally inclusive and that opportunities are presented in a way that guarantees equity. Respect, empathy and acceptance are fundamental guidelines for the promotion of diversity within our institution.

In 2023, we launched “All BS2”, our corporate diversity and inclusion program, which aims to promote initiatives for an inclusive culture in the BS2 Companies’ environment. Learn more about the program in the [Diversity and Inclusion Policy](#).

 Click on the QR Code and access!



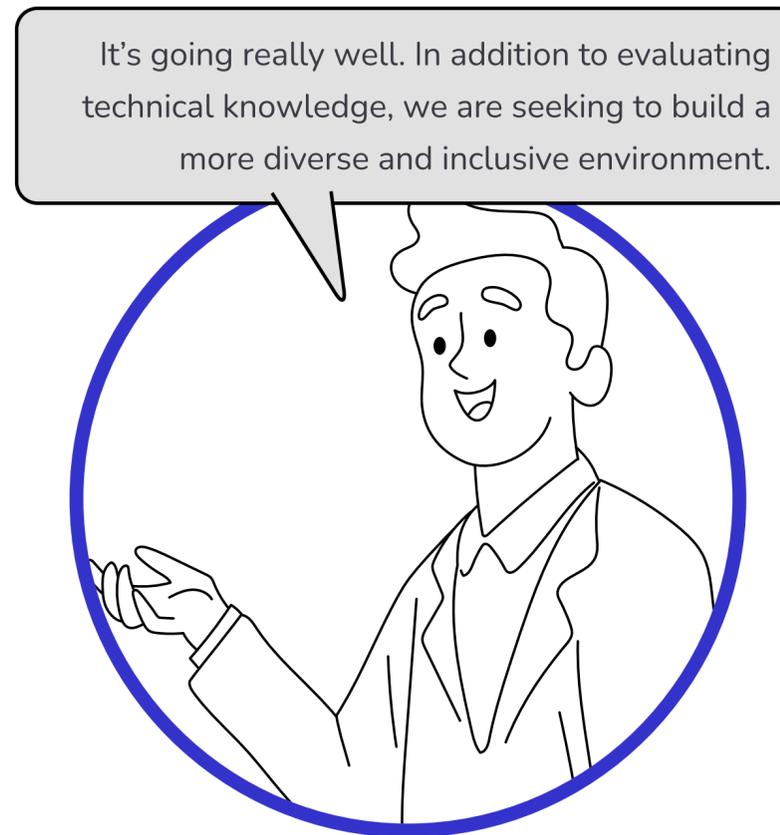
Diversity and Inclusion Policy





02. INTEGRITY

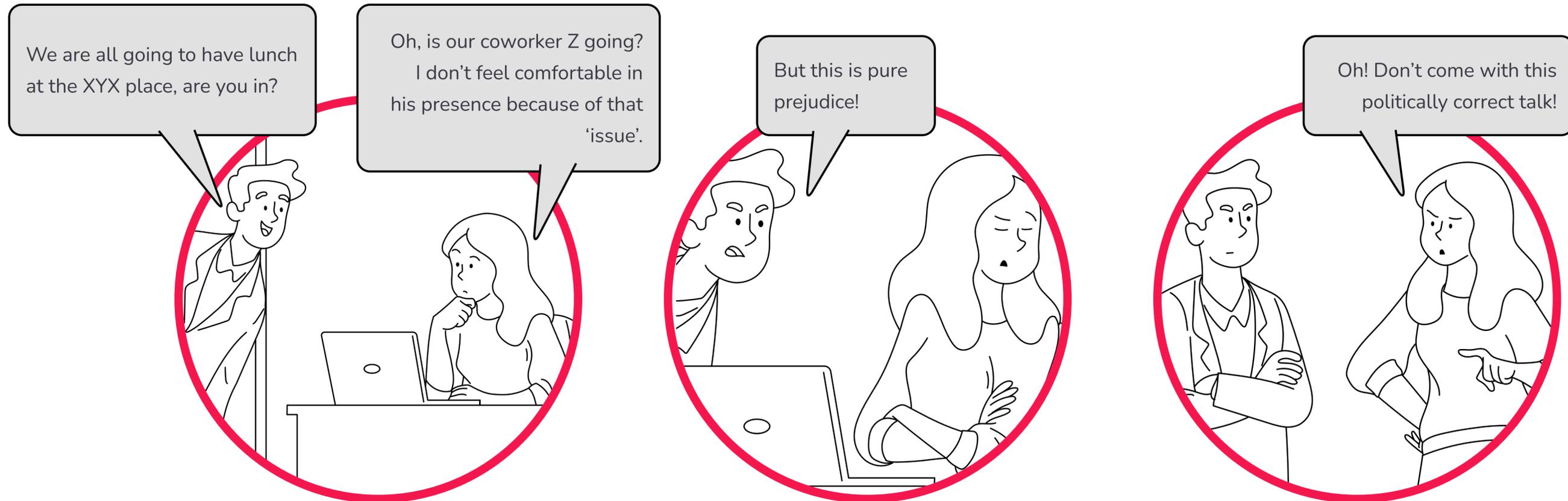
PROPER CONDUCT





02. INTEGRITY

IMPROPER CONDUCT





03. TRANSPARENCY

Conflict of Interest Prevention

Any situation where personal or financial interests conflict with **BS2** company guidelines, is prohibited.

All employees, third parties, suppliers or partners, if they identify any case of potential conflicts of interest, must complete the Conflicts of Interest Questionnaire.

Examples of situations that are not accepted in **BS2**:

- › Direct subordination between employees who have a family relationship;
- › Approval of payments or contracting of suppliers, partners, and service providers by employees who are partners or relatives of partners of the contracted companies;
- › Sharing strategic information with employees or partners of companies that are competitors in the market of BS2 companies;
- › Carrying out other professional activities, paid or unpaid, in the same working hours in BS2 companies, or that affect the performance of their duties;
- › Carrying out other professional activities, even if compatible with the working day, but that conflict with the business and interests of BS2 companies;
- › Carrying out parallel activity, paid or voluntary, without proper

communication to the area of People and Culture;

- › Use of privileged information about companies customers of the BS2 to obtain benefit in personal business or third parties;
- › Solicitation of favors or benefits to a public agent or politically exposed person (BS2), to obtain advantages on behalf of the BS2 companies, before the public authorities;
- › Any other conduct that violates the guidelines set out in the Conflict of Interest Policy.

Important! It is forbidden to link political opinions and support for political candidates and parties to BS2 Companies, even when the manifestations occur in the private sphere. Likewise, it is forbidden to conduct campaigns, advertisements, and political discussions within the corporate environment.

It is our duty to always act impartially, fairly and honestly. In this Code, there are examples of forbidden conducts, but this list is not exhaustive. Often, situations of conflict of interest may not be easily identified. If in doubt, raise the issue with the Compliance team or through the [Compliance Answers](#).



03. TRANSPARENCY

😊 PROPER CONDUCT





03. TRANSPARENCY

IMPROPER CONDUCT

What about that selection process? Is it closed? There is the son of a friend of mine, he has little experience but he is very hard working. I need to return a favor to him. How about we hire his son for the position?



We can review his resume and do an interview to see if he has the required profile and skills, no problem.



But here's the thing... he has no experience and I need to return a favor. Let's hire him.





03. TRANSPARENCY

Gifts, Presents, Freebies, Travel and Hospitalities

Giving and receiving gifts, presents, freebies, travel and hospitality is a common practice in the market, as long as it occurs in a transparent and appropriate manner.

In some situations, offering or receiving these items may generate expectations or claims of favor, which can cause perceptions that a bribery or an inappropriate advantage has occurred, and may characterize a situation of conflict of interest.

Through the page [“Received anything!? Let us know here!”](#), on the Intranet, you declare the receipt or offer of gifts, freebies, travel and hospitality to comply with our policy on this subject. If you need help, ask your manager or Compliance team for assistance.

The offer of gifts, freebies, travel and hospitality to government agents must not exceed the limit of **R\$100.00** (one hundred reais).

 Click on the QR Code and access!



Received anything!?
Let us know here!





03. TRANSPARENCY

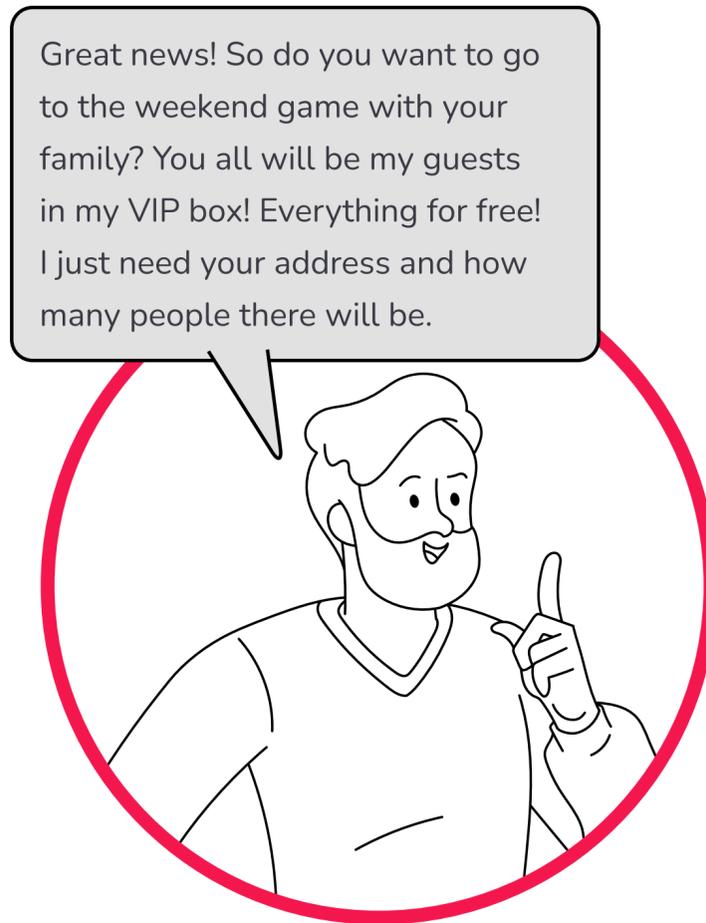
😊 PROPER CONDUCT





03. TRANSPARENCY

IMPROPER CONDUCT





03. TRANSPARENCY

Donations and Sponsorship

Contributions made by **BS2** companies, through donations and sponsorship, are carried out with maximum transparency, integrity, legality and accountability. All guidelines to be followed for this process are detailed in [Sponsorship Policy](#) and the [Donation and Volunteer Policy](#).





03. TRANSPARENCY

Relationship with stakeholders

::Investors and Shareholders



In all our companies, we apply practices of transparency and equal treatment to our investors and shareholders, providing the necessary information to monitor the organization's performance.

::Public Power



All employees must ensure transparency, availability and accuracy in the exchange of information and in meeting the requests made by the government, regulatory and supervisory bodies. It is expressly prohibited for any employee to offer, promise, authorize or give, directly or through third parties, any advantage to public agents, political parties and their members or candidates for public office, whether in Brazil or abroad.



03. TRANSPARENCY



::Partners and Suppliers

We value mutual respect, transparency and honesty with our partners and suppliers. Likewise, we expect them to comply with their obligations, especially with legal, tax, socio-environmental and occupational safety issues. Respect for human rights is also extremely important - not practicing slavery-like or child labor – as well as not carrying out acts of corruption, fraud or any act that constitutes conflict of interest.



03. TRANSPARENCY



::Customers

The **BS2** companies' customers are our reason for being. Therefore, we are guided by the following principles:

- › Transparency in carrying out operations.
- › Efficient service.
- › Commitment to customer satisfaction.
- › Compliance with legislation.
- › Respect for customer privacy and rights.
- › Confidentiality about the information received.



03. TRANSPARENCY



::Competitors

All **BS2** companies are committed to complying with the competition and protection laws, guided by the following principles:

- › Respect for freedom of initiative and free competition;
- › Adoption of legitimate competitive strategies;
- › Rejection of anti-competitive practices;
- › Independent establishment of pricing and trade policies.



04. RESPONSIBILITY

Social and environmental Responsibility

Based on the structuring of our sustainability agenda, we assume the responsibility of placing ourselves as a catalyst for sustainable development, through initiatives that connect our activities to the environmental, social and governance perspectives.

We also adopted various actions, with the aim of bringing us closer to our employees and partners, seeking to mitigate negative impacts and enhance the positive ones in our business. Find out more about these responsibilities at [Social and Environmental Responsibility Policy](#). Check out some of the projects we support.





04. RESPONSIBILITY

Ethics Channel

It is the responsibility of all of us to strengthen the image of **BS2** companies, always acting with Ethics and Integrity! If you witness or learn of any violation of this Code of Ethics, it is important to report the violation immediately. You can look for your direct manager, the Compliance team or make a report on our Ethics Channel – which is coordinated by an external consultancy, thus ensuring the confidentiality of information.

The report can be anonymous. And don't worry, no retaliation will be allowed if you file a report. But **it is important that you act in good faith** and always maintain an ethical commitment.





04. RESPONSIBILITY

No bona fide complainant or witness involved in an investigation process will be:

- › Dismissed or threatened with dismissal;
- › Subject to disciplinary action, suspension or threat;
- › Intimidated or coerced.

Employees retaliation in disagreement with this rule will not be tolerated and, if proven, may lead to disciplinary measures and even the dismissal of the person responsible for the retaliation.

All reports will be investigated and conducted by Compliance, being taken to the Integrity Committee, when necessary, which will take the necessary measures.

You can access the [Ethics Channel](#) through the Intranet, through the website <http://www.contatoseguro.com.br/canaldaeticabs2>, the Contato Seguro application or register your report by phone 0800 517 0011.

 Click on the QR Code and access!



Ethics Channel



E-mail



05. SECURITY

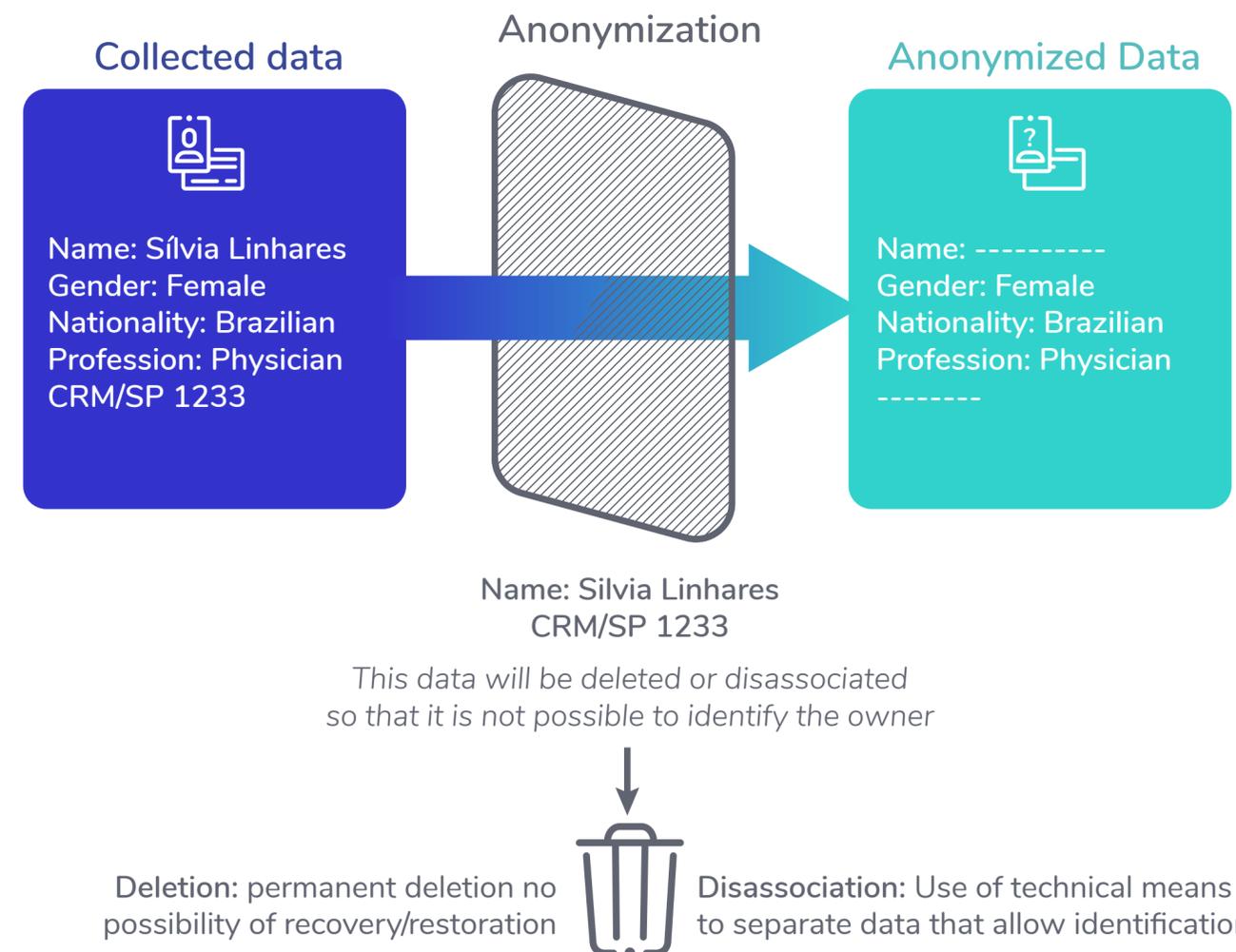
Secrecy and Security of Information

It is our duty to preserve and guarantee the confidentiality and security of the information that comes to our knowledge for the performance of our activities.

When processing the information, whether in **collection, handling, storage, transport or disposal**, we must preserve **confidentiality** (only authorized persons can access them), **integrity** (do not alter them unless permitted) and **availability** (keep them available to authorized persons). **We count on you!**



Example of Anonymization of Personal Data





05. SECURITY

Using information for a purpose unrelated to your activities or for your own benefit and/or third parties is illegal. What is ours or has been entrusted to us must not be shared.



Examples of Security Incident

unauthorized access

accidental or illicit situations

loss, alteration or any form of improper or unlawful treatment of the information



05. SECURITY

Pay attention, follow the information security guidelines and comply with the legislation and regulations in force, which layout the cybersecurity policy and the requirements for contracting services for processing and storage of data and cloud computing.

We must support and practice the safety rules of all **BS2** companies. If in doubt, contact the Information Security team to assist you.





05. SECURITY

Privacy and Protection of Personal Data

Any personal data processing activity that is under the responsibility of the **BS2** companies, whether a customer, shareholder, employee, intern, third party, partner or supplier, must comply with the [General Personal Data Protection Law \(LGPD\)](#).

Thus, in addition to the effective application of security controls and governance measures and good practices, it is important to use personal data exclusively for the purpose for which it was collected, observing the limits of its use, as well as confidentiality, integrity and availability.

 Click on the QR Code and access!



General
Personal
Data
Protection
Law



05. SECURITY

We have an obligation to protect personal data in all our services, products and processes. Therefore, it is essential to involve the Information Security and Legal team, as well as the Data Protection Officer (DPO), a figure created by the LGPD and appointed by BS2 since 2020. In this way, the new services, products or processes begin to comply with privacy and personal data protection requirements from the beginning.

It is important that you know that any violation of the LGPD, however small it may seem, can result in financial losses and reputational damage to the **BS2** companies. And those involved can face disciplinary measures and be held civilly and criminally liable. Therefore, we count on your help to fulfill the [Policies and Standards of Cybersecurity, Personal Data Governance and Privacy Policies and Standards](#).

If you have any questions related to this topic, please contact our DPO (Data Protection Officer) by e-mail dpo@bancobs2.com.br.

 Click on the QR Code and access!



Cybersecurity, Personal Data Governance and Privacy Policies and Standards



Data Protection officer

Non-conformity with Standards and Conduct

When proven deviation of conduct, irregularity, illegality or attitude contrary to this Code of Ethics and other policies, rules and procedures of the institution by board members, directors, leaders, employees, trainees, service providers, business partners and suppliers of BS2 companies in the national and international sphere, there will be application of administrative measures established by the Consequences Management norm.

