

# Code of Ethics and Conduct

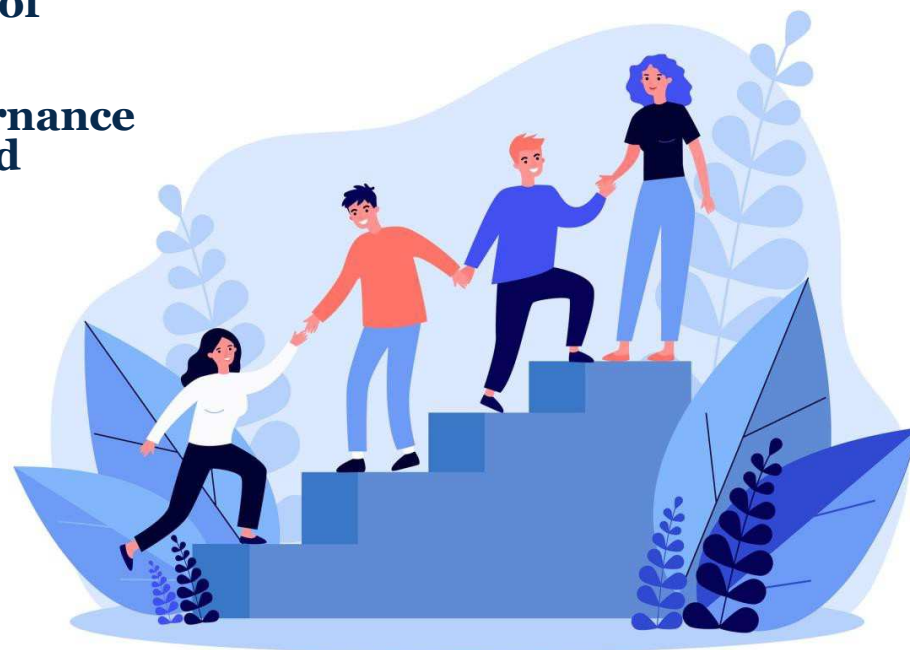
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# Message from the President

Our culture is marked by optimism, a commitment to Brazil's growth and a strategic vision aimed at the long-term sustainability of our business. We position ourselves as a company **made of people and for people** who believe, undertake, take risks and develop our country.

We encourage an environment of open dialogue, always seeking to act with truth and clarity, supported by a relationship of respect and inclusion that values diversity. Accordingly, **we conduct our activities seeking to put into practice our values, whose foundations are guided by ethics, transparency, trust and integrity.**

In line with these ethical values, Fibra's Integrity Program includes ensuring the adequacy, strengthening and operations of our internal controls system, seeking to comply with the laws, regulations, and internal rulings in our relations with customers, employees and business partners.



We conduct our activities seeking to put into practice our values, whose foundations are guided by ethics, transparency, trust and integrity.

This Code of Ethics and Conduct, which is one of the pillars of the Integrity Program and reinforces our purposes, **demonstrates the role that each of us must play** to ensure an **environment of trust, supported by ethical decisions and values that** are part of our daily lives and sustain the integrity and reliability of our institution.

Enjoy your reading!

**Arno Schwarz**



# Target Audience and Description

Just as people, companies have their own unique characteristics. For this reason, the codes of conduct and ethics define the way they operate in the market and the expected behavior of their employees and other service providers, while respecting the **individual characteristics of each one of them.**



Our Code of Ethics and Conduct gathers the guidelines that must be respected by all relationship professionals of Banco Fibra S.A. and its subsidiaries (“Fibra”), including its **Board Members, Directors, (together with the Directors, called “Senior Management”), Employees, Partners, Suppliers and Service Providers**, seeking to comply with ethical conduct standards in the fulfillment of our duties and exercise of our activities.

In addition, this Code reflects the cultural identity and the commitments assumed in the markets where we operate, and, therefore, **the behavior expected from everyone who works on behalf of the Institution.**

# Our Culture



At Fibra, we aim at **solving the present time for people who make the future**. This motivates us to do more and better for our customers. We have four attributes that make up our “Way of Being.” They are:

## We have the customer's eye



We know, understand and respect the challenges of those who produce in Brazil. We **honor our commitment** to our customers and deliver the best services in an incredibly fast way. Our **attitude is always positive and constructive**, as we believe that, to be good, a business must be good for all its stakeholders.



## We are leaders and make it happen

We are determined, patient and resilient in turning ideas into a business reality. We compete for our client and take responsibility for all initiatives in which we are involved. **We bring innovation and we are always close.**

## We are transparent and we are not afraid to tell the truth



We always speak the truth. Transparency makes us more **aligned, collaborative and agile**. It facilitates dialogue and removes politics from our corporate life. We encourage a **respectful and trustworthy environment for conversations**, and deal with problems with constructive criticism and without hiding mistakes.



## We recognize the excellence of people, always

We believe that **a company with the best people delivers the best services and creates the best solutions**. We always challenge ourselves so that the best ideas sprout and thrive. We always seek to go further, and we are recognized for our deliveries.



# Basic Principles



The ethical principles that **guide the activities of professionals working on behalf of Fibra** also underpin the image of a solid and reliable company before the eyes of stakeholders, should they be our customers, users, employees, partners, suppliers, service providers and oversight bodies.

## Ethics

## Integrity

**Repudiation of Unlawful Practices**

**Confidentiality and Information Security**

**Quality**

**Reputation**

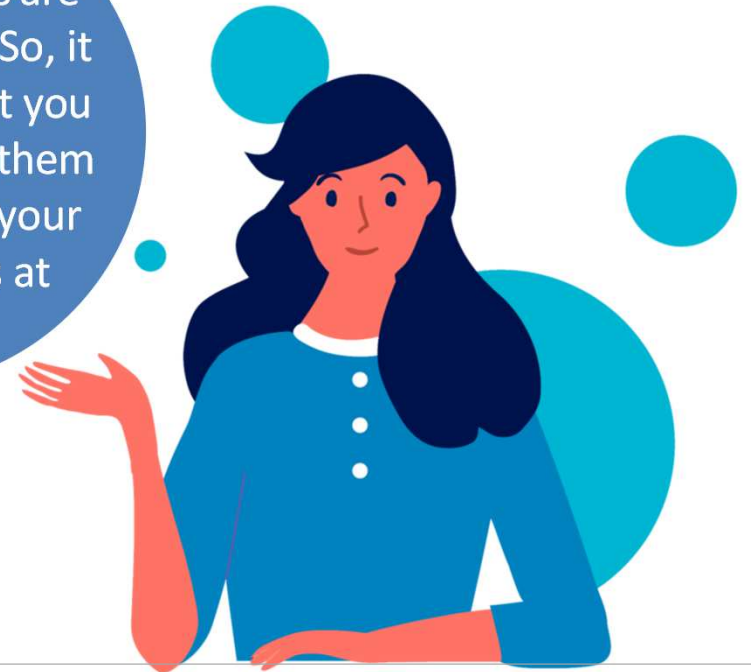
**Human  
Rights**

**Social and  
Environmental  
Responsibility**

**Attention to Personal Finances**

**Repudiation of Conflicts of Interest**

These principles are **not negotiable**. So, it is important that you put each one of them into practice in your daily activities at Fibra!



# Basic Principles

Now, let's detail the **principles of our Code of Ethics and Conduct** and the expected behavior regarding each of them:

## Ethics

- ✓ Build **sustainable and lasting partnerships and relationships**, in accordance with the applicable laws and our corporate guidelines;
- ✓ Act in line with the **institutional guidelines and values**, based on moral values;
- ✓ Use a **clear and open dialogue**, aiming at a constructive, healthy and collaborative environment; and
- ✓ Maintain **personal and professional ethics** in accordance with the expected behavioral parameters described in this Code.



# Basic Principles



## Integrity

- ✓ Demonstrate honesty, responsibility and impartiality standards in personal and professional conduct in our work;
- ✓ Promote an **equal and inclusive treatment in relationships**, avoiding favoritism, harassment or persecution; and
- ✓ Adhere to the rules and laws applicable to our business;
- ✓ **Avoid illegal, fraudulent, immoral or unethical behavior**, including in connection with financial and/or business dealings.
- ✓ **Act honestly** in our business and professional and personal relationships, so that no act will harm Fibra and its subsidiaries financially or reputationally;
- ✓ **Guide all relationships with respect for differences**, whether racial, physical, religious, cultural, sexual orientation, gender identity, social, regional, age, ideas, origin, ability, appearance, or social class.



# Basic Principles



## Repudiation of Unlawful Practices

- ✓ Maintain **compliance with national and foreign laws, regulations and standards** and with Fibra's internal regulations, in order to follow the standards of conduct that it maintains with its stakeholders and the society;
- ✓ **Do not perform unlawful activities**, including, but not limited to, those resulting from corruption, money laundering, internal or external fraud, directly or indirectly arising from professionals, partners, suppliers and service providers acting on behalf of this institution;
- ✓ **Comply in all respects with the guidelines set forth in Anti-Corruption Law No. 12.846/13**, since Fibra is expressly prohibited from engaging in any form of corruption against public administration, whether national or foreign;
- ✓ **Do not promote or tolerate actions relating to any type of harassment**, whether sexual, moral, **bullying, racism, transphobia, lesbophobia and homophobia**. Fibra repudiates any type of harassment, as well as any action that violates the individuality and valorization of Diversity and Inclusion of its *stakeholders*.



# Basic Principles



## Confidentiality and Information Security

- ✓ **Maintain strict confidentiality** regarding the data and information of our customers, employees, partners, suppliers and service providers, according to the guidelines established in the applicable standards, including the General Data Protection Law ("LGPD");
- ✓ Protect the **confidentiality and privacy of our customers' personal and financial information**, treating the information provided by customers as confidential when applicable. Therefore, the transmission of such information to third parties is not allowed, except with the express and prior consent of customers, or as a result of a legal obligation;
- ✓ **Use our equipment**, as well as **other corporate tools**, such as systems, e-mails and communication channels properly and according to our internal guidelines, and exclusively for the performance of professional activities; and
- ✓ Apply confidentiality guidelines also in the communications relating to Fibra in social medias and other Internet forums, **avoiding the disclosure of any information that is confidential, or not, without proper authorization.**



# Basic Principles

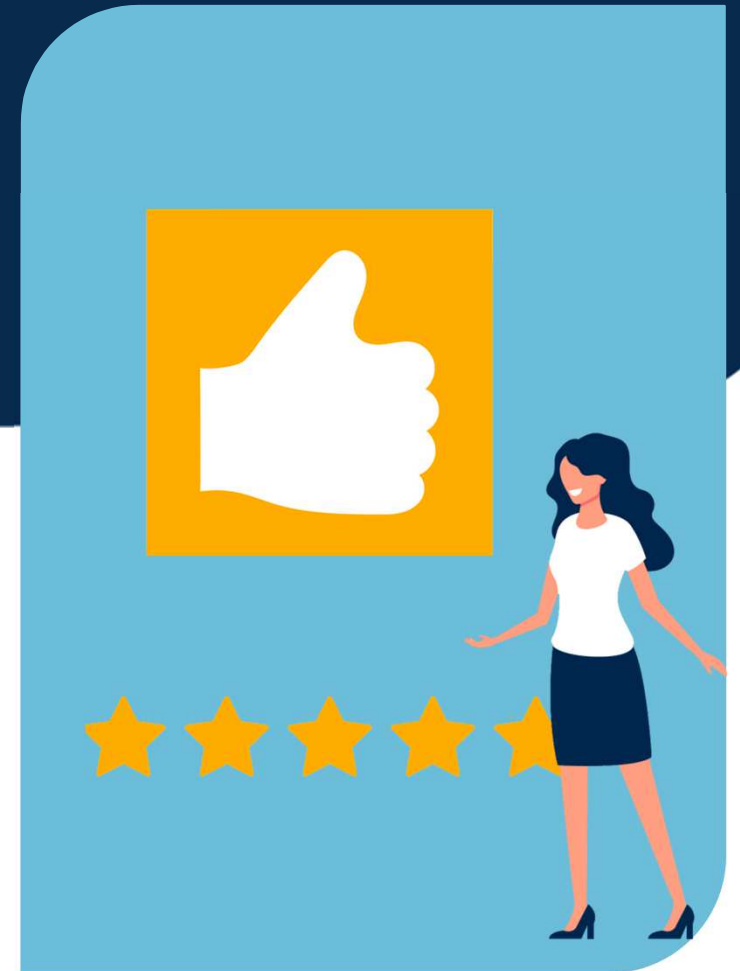


## Quality

- ✓ Provide **products and services of the highest quality**, according to the best market practices and the profile of each client; and
- ✓ Perform **functions following the highest standards of excellence**, within our high-performance culture.

## Reputation

- ✓ **Act with dedication and ethics** to achieve the satisfaction of our customers;
- ✓ Obtain the **results in an honest, fair, legal and transparent manner**; and



# Basic Principles

## Human rights

Banco Fibra reaffirms its commitment to recognizing and upholding the inherent dignity of every human being. The principles of human rights serve as a foundation for how individuals coexist within society, engage with one another, and interact with the broader social structure.

✓ **Commitment to Diversity, Inclusion and Non-Discrimination:** we are committed to fostering an environment guided by respect for individual differences, including—but not limited to—race, physical characteristics, religion, culture, sexual orientation, gender identity, social background, region of origin, age, beliefs, nationality, abilities, appearance, and socioeconomic status. We promote equal and inclusive treatment in all interactions, actively working to prevent favoritism, harassment, persecution, discrimination, and prejudice.

✓ **Repudiation of Discrimination and Prejudice:** both within and beyond the Bank's organizational environment—is non-negotiable. This commitment entails a firm rejection of any deliberate conduct that undermines the individuality, dignity, or diversity of stakeholders, as well as any negligent behavior in the face of such actions

Any violation of this principle—whether through discriminatory or prejudiced behavior, or through the dissemination of unfounded biases—will be subject to the appropriate disciplinary measures as outlined in this Code of Ethics and Conduct.



# Basic Principles



## Social and Environmental Responsibility

- ✓ Collaborate with the communities in which we operate, and **contribute**, to the extent possible, **with actions favorable to the sustainable development** of society; and
- ✓ Respect the environment.

## Attention to Personal Finances and Repudiation of Conflicts of Interest

- ✓ Manage personal finances, including investments, **in a manner compatible with the exercise of a function or relationship** with a financial institution;
- ✓ **Provide against financial imbalances**, managing personal business with planning, prudence and responsibility; and
- ✓ **Do not use the resources, information or reputation** of Fibra or its customers to get personal benefits for yourself or third parties;
- ✓ **Do not carry out external activities that conflict** with the fulfillment of your responsibilities in this institution.

# Integrity Program



In the next pages, we will understand better other **guidelines** that are part of this Code of Ethics and Conduct and **derive from our Integrity Program**.

As an institution committed to national and international Anticorruption initiatives and, particularly, in accordance with **Law No. 12.846/2013**, known as **Anti-corruption Law**, Fibra has an **Integrity Program** that is approved by the Board of Directors, and encourages an environment of ethical behavior and responsible engagement.

Senior management unrestrictedly supports compliance with the Integrity Program, and Fibra's Governance is established to ensure adequate maintenance of and compliance with the Program's guidelines, including risk management and acculturation actions throughout Fibra's different management levels.





# Integrity Program



This governance comprises the Ethics Committee and the Compliance, AML/TF, and Social and Environmental Risk Committee, which also cover topics relating to the Integrity Program:



## **Ethics Committee:**

Promotes an ethical culture at Fibra and its subsidiaries, approving the related policies and resolving on personal and professional conduct issues that involve the employees and third parties, in order to provide an honest and healthy work environment.

## **Compliance, AML/TF, and Social and Environmental Risk Committee:**

The attributions of this committee include, among others, monitoring the Integrity Program to ensure the dissemination of integrity and ethical conduct standards as part of Fibra's culture.



# Rules for receiving giveaways and gifts



**Acting with integrity** also includes not accepting giveaways, gratuities or gifts that may incur in a conduct characterized by the obtainment of an undue advantage due to the activities performed at the Institution. Therefore, our Code of Ethics and Conduct provides rules for receiving giveaways and gifts.








## How to react in case of the offer/receipt of giveaways, gratuities or gifts?

### General public

Managers, employees and service providers acting on behalf of Fibra may only receive giveaways, gifts and/or gratuities according to the characteristics below; **not exceeding the amount of three hundred and fifty *Reais* (BRL 350.00)**; and based on concrete and exceptional reasons.

## The following items are considered giveaways, gifts and/or examples of gratuities:

-  Training programs and courses of any kind;
-  Trips;
-  Invitations to concerts, parties and related events;
-  Meals (other than for business purposes) and drinks;
-  Giveaways or souvenirs that do not contain the logo of the person providing the gift (corporate giveaways);

# Rules for receiving giveaways and gifts



In order to prevent unlawful acts, and, consequently, in compliance with anti-corruption rules, which provide for the objective administrative and civil liability of legal entities for acts against the national or foreign public administration, any gifts and/or giveaways offered to/received from government agents should only be offered/received if they **involve meals within the scope of business, and/or gifts that contain the logo of the person providing the gift (corporate gifts), provided that they do not exceed three hundred and fifty reais (BRL 350.00).**

**National or Foreign Public Agents:**

**Notify Compliance:** Any intention to offer or receive giveaways, gratuities, courtesies or gifts to/from government entities, customers, business partners, third-party service providers or even the public in general **exceeding the amount of three hundred and fifty Reais (BRL 350.00)**, or that do not comply with the rules of this Code, must be informed to the Compliance area through the e-mail box **["compliance.regulatorio@bancofibra.com.br"](mailto:compliance.regulatorio@bancofibra.com.br)**

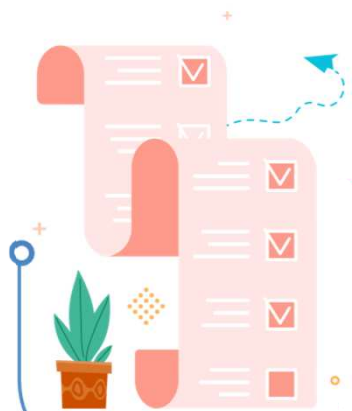


# Relationship with the Public Sector



## How to proceed in case of relationship with the Public Sector?

The relationships and contacts maintained by Fibra with the **Public Sector and its respective agents**, regardless of the body, position held or hierarchy of the agents, their family members (spouse, children, parents, stepfather, stepmother, siblings, grandparents, brothers-in-law or mother or father in-law) or advisors, require that the managers, employees or representatives acting on behalf of Fibra **use transparent procedures, including good faith, adequate accountability, and compliance with the law.**



In the relations with the Public Sector, it is also mandatory to **comply with the criteria set out in Fibra's policies** regarding the controls for preventing money laundering and terrorist financing (AML/TF), as well as to respect the procedures established in the Internal Anti-Corruption and Public Sector Relations Regulations.

These rules are applicable to business relationships with public entities, whether as a **customer, in contracting products and services, in providing services or in commercial partnerships.**

# Relationship with the Public Sector

Fibra **expressly prohibits** the granting of undue advantages, economic or otherwise, to public agents. Therefore, it is strictly prohibited for managers, employees or third parties acting on behalf of the institution:



When coming across signs of non-compliance with the established guidelines on relationships with the public sector, **immediately contact the Compliance area, or file a complaint through the “Alô Ética” Channel!**

Fibra's Code of Ethics and Conduct



To **entice** authorities, public servants and candidates for public office **through undue advantages**, either to facilitate business, comply with legal obligations or speed up routines. Such practices are considered corruption and constitute legal infractions;



To use **sponsorships or personal political donations to obtain** undue benefits for the institution, for themselves or for third parties;



To make **comments of a political nature, or any derogatory nature, for obtainment and benefit**, which may compromise the maintenance of relationships that must be commercial; and

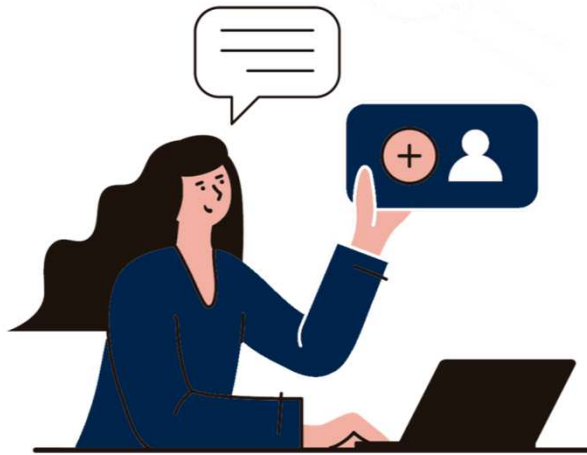


To promote **contributions, directly or indirectly**, through Fibra, for electoral campaigns, candidates for public office and political parties.

# Our Whistleblower Channels



## “Alô Ética” Channel



The “Alô Ética” Channel is intended to customers, users, employees, partners, suppliers or service providers who want to report, anonymously or not, any unlawful acts, including those mentioned in **Anti-corruption Law No. 12.846/13** relating to corruption, fraud, money laundering, misbehavior, sexual or moral harassment, racism, homophobia, and other attitudes that may violate the guidelines of this Code of Ethics and Conduct.



**E-mail:**

[bancofibra@aloetica.com.br](mailto:bancofibra@aloetica.com.br)



**Voice Channel:**

0800 718 2837



**Form:**

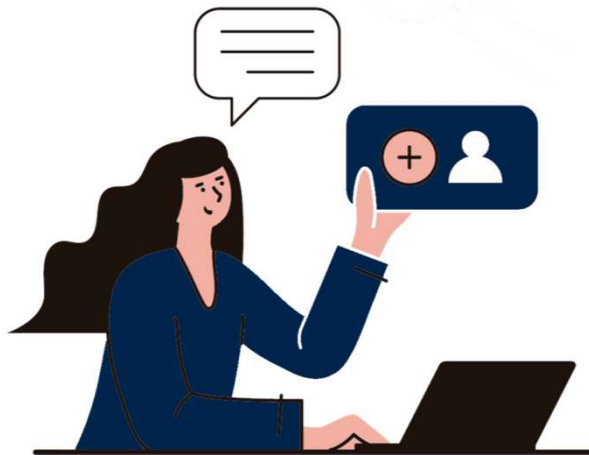
[aloetica.com.br/bancofibra](http://aloetica.com.br/bancofibra)



# Our Whistleblower Channels



## “Alô Ética” Channel



To ensure **impartiality in handling the communications received, and non-retaliation or non-constraint of the informants**, the channel is managed by **an outsourced company specializing in whistleblower channels**. In addition, the whistleblower can follow up the complaint at any time by consulting, in the Channel’s website, the protocol generated at the time of the report..



**Remember: if you have a doubt, report it!**

# Our Whistleblower Channels



## Women's Support Channel

Fibra's employees also have the Women's Support Channel, which is exclusive for **complaints relating to gender violence**. Employees who are experiencing any type of violence (physical, psychological, sexual, property-related and/or moral) can reach this channel to be assisted by our People area and/or by our occupational physician. Communication is by e-mail and confidentiality is guaranteed to the informant.



E-mail: [apoioamulher@bancofibra.com.br](mailto:apoioamulher@bancofibra.com.br)

# Statement to the Press and Social Media

Employee must contact the Customers and Marketing area in advance, in cases where it is necessary to make **any statement or disclose any information about or on behalf of Fibra in the Press, Social Media, Articles/Cases, participation in Events or any means of communication.**

Employees must be careful when declaring their personal opinions in social medias or other forums, so that they their opinions are not confused with the official opinions of Fibra.

Fibra does not tolerate any type of discrimination, harassment and abuse in social medias, even when it does not relate directly to the company.



# Disciplinary Sanctions



- ❑ The confidentiality of reports received regarding violations of this Code is assured to the whistleblower.
- ❑ Additionally, without prejudice to the disciplinary sanctions above, non-compliance with the provisions of this Code may give rise to the determination of liability in the civil and criminal spheres.




# Acceptance of the Code of Ethics and Conduct

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Now that you know our Code of Ethics and Conduct in detail, you, as an employee of Fibra, must sign the **Instrument of Acceptance of the Code of Ethics and Conduct**. This action will ratify your commitment to complying with the principles established herein.

Annually, you will be invited to review this content through an Online Training. Be sure to follow it and keep up to date always!



[Click here](#) to access the instrument of acceptance!

# Management and Governance of the Code of Ethics and Conduct



## Compliance Area:

The Compliance area is responsible for maintaining and updating the Code of Ethics and Conduct and monitoring its compliance.

## Ethics Committee (\*):

Resolve on situations that involve non-compliance with any guidelines relating to this Code of Ethics and Conduct.

## Approval of this Code of Ethics and Conduct:

- ☐ Board of Directors; and
- ☐ People Area.



### ✓ Associated Standards:

- ✓ 01-07-02/1 Compliance;
- ✓ 01-07-04/1 Anti-corruption, Antitrust and Relationship with Public Sector;
- ✓ 01-07-19/1 Organization of Committees;
- ✓ 01-07-27/1 Human Rights;
- ✓ 01-09-07/1 Cyber Security;
- ✓ 01-03-08/1 Reputational Risk Management;
- ✓ 01-07-18/1 Social, Environment and Climate Responsibility (PRSAC)
- ✓ 01-10-03/1 “Alô Ética” Channel; and
- ✓ 01-14-20/1 Diversity and Inclusion.

### ✓ Attachments that make up this Code of Ethics:

- ✓ Integrity Program;
- ✓ Instrument of Acceptance – Code of Ethics and Conduct;
- ✓ Deed of Responsibility - Conflicts of Interest; and
- ✓ Questionnaire – Conflicts of Interest.



BANCO  
**FIBRA**

**We count on  
you! 🤗**

