



Code of Ethics and Conduct

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Message of the President

Our culture is marked by optimism, commitment to Brazil's growth and a strategic vision that aims at the long-term sustainability of our business. We position ourselves as a company made by people 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 and that values diversity. In this way, 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, the Fibra Integrity Program includes ensuring the adequacy, strengthening and operation of the institution's internal control system, seeking to



We carry out our activities by putting our values into practice, grounded in ethics, transparency, trust, and integrity.

comply with laws, regulations, internal regulations in their relations with customers, employees and business partners.

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

Happy reading!

Arno Schwarz



Target Audience and Description

Just as individuals possess unique traits, companies also exhibit distinct and singular characteristics. Accordingly, codes of conduct and ethics serve to define their approach to market operations and establish expectations regarding the behavior of employees and third-party service providers—while upholding respect for each individual's personal attributes



Our Code of Ethics and Conduct brings together the guidelines that must be observed by all relationship professionals of Banco Fibra S.A. and its subsidiaries ("Fibra"), including Directors, Officers (together with Directors, called "Senior Management"), Employees, Partners, Suppliers and Service Providers, seeking standards of ethical conduct in the fulfillment of duties and in the exercise of activities.

In addition, this Code reflects the cultural identity and commitments assumed in the markets in which Fibra operates, and, therefore, **the behavior expected of all those who act on behalf of the Institution.**

Our Culture



At Fibra, we have the purpose of solving the now for the people who make tomorrow. 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 look

We are committed to our customers and pride ourselves **on delivering exceptional service** with remarkable speed. Our **attitude is always positive** and constructive, as we believe that in order to be good, a business needs to be good for all parties.



We are leaders and we make things happen

We have the determination, perseverance, and resilience to turn ideas into business reality. We compete for our clients and take ownership of every initiative we are involved in. **We drive innovation and stay closely connected at every step.**



We embrace transparency and speak the truth with courage and integrity

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



We consistently recognize people's excellence

We believe that a company **with the best people delivers the best service and creates the best solutions**. We constantly challenge ourselves to ensure that the best ideas emerge and thrive. We always strive to go further and are recognized for the quality of our results.



Basic Principles



The ethical principles that **guide the exercise of the activities of the professionals who act on behalf of Fibra**, also support the image of a solid and reliable company before stakeholders, whether they are customers, users, employees, partners, suppliers, service providers and supervisory bodies.

Ethics

Repudiation of illicit practices

Confidentiality and Information Security

Quality

Human Rights

Watch Your Personal Finances

Repudiation of Conflict of Interest

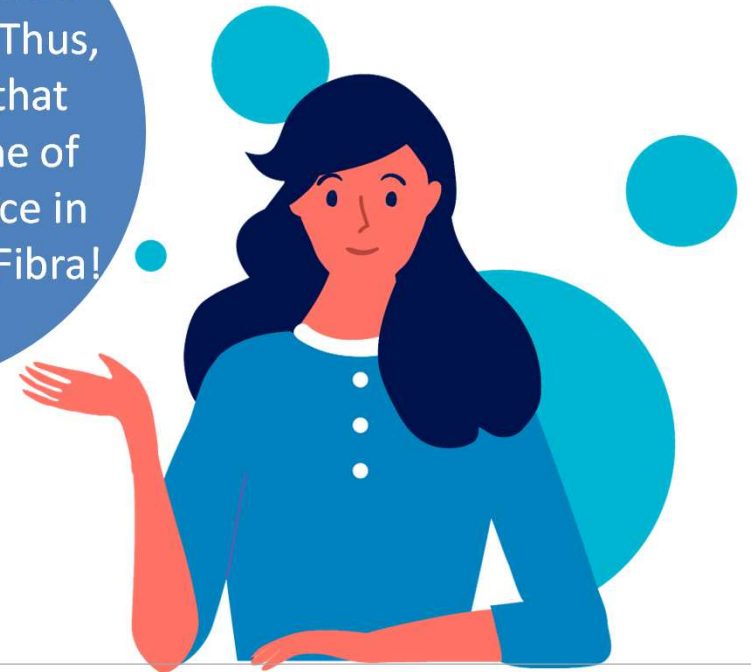
Relationship with Stakeholders

Integrity

Reputation

Social and Environmental Responsibility

These principles are **non-negotiable**. Thus, it is important that you put each one of them into practice in your daily life at Fibra!



Basic Principles

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

Ética

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



Basic Principles



Integrity

- ✓ Demonstrate standards of honesty, responsibility and impartiality in personal and professional conduct in all activities performed;
- ✓ Promote equal and inclusive treatment in relationships, avoiding favoritism, harassment or persecution;
- ✓ Maintain adherence to the standards and laws applied to our business;
- ✓ **Refrain from illegal, fraudulent, immoral or unethical behavior**, including in relation to financial and/or commercial negotiations;
- ✓ **To act honestly** in our business and professional and personal relationships, so that no act will financially or reputationally harm Fibra and its subsidiaries; and
- ✓ **Foster a culture of Organizational Integrity**, stimulating an ethical environment and responsible involvement of each employee and those involved.

Basic Principles



Repudiation of illicit practices

- ✓ Maintain **adherence to national and foreign laws**, regulations, self-regulations and standards, in addition to complying with Fibra's internal regulations, in order to follow the standards of conduct that is maintained with its stakeholders and society;
- ✓ **Not to engage in any illegal 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 aspects with the guidelines of Anti-Corruption Law No. 12,846/13**, since in Fibra it is expressly forbidden to practice acts of any form of corruption against the public administration, national or foreign; and
- ✓ **Do not promote or tolerate acts related to any type of harassment**, whether sexual, moral, bullying, or even practices related to racism, transphobia, lesbophobia and homophobia. Fibra repudiates any type of harassment, as well as any act that violates the individuality and appreciation of Diversity and Inclusion of any of its stakeholders.





Confidentiality and Information Security

- ✓ **Maintain strict confidentiality** in relation to the data and information of our customers, employees, partners, suppliers and service providers, in accordance with the guidelines established in the applicable regulations, including the General Data Protection Law ("LGPD");
- ✓ To **safeguard the confidentiality and privacy** of our customers' personal and financial information, treating, when applicable, the information provided by customers as confidential, and therefore its transmission to third parties is not allowed, except with the express and prior consent of the customer 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, appropriately and in accordance with our internal guidelines and exclusively for the exercise of professional activities; and
- ✓ Apply confidentiality guidelines also to communications related to Fibra on social networks and other Internet forums, refraining from **disclosing any information that is confidential, or not, without proper authorizations**.



Rules for receiving gifts and gifts



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








How to act in case of offering/receiving gifts, gratuities or gifts?

General public

Administrators, employees and service providers acting on behalf of Fibra, may only receive gifts, gifts and/or gratuities, according to the characteristics mentioned below, which do not exceed **the amount of R\$ 350.00** (three hundred and fifty reais), and due to concrete and exceptional reasons.

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

-  General Training and courses
-  Travel
-  Invitations to concerts, parties, and related events
-  Meals (when not for business) and drinks
-  Gifts or souvenirs that do not contain the logo of the person providing the gift (corporate gifts)

Basic Principles

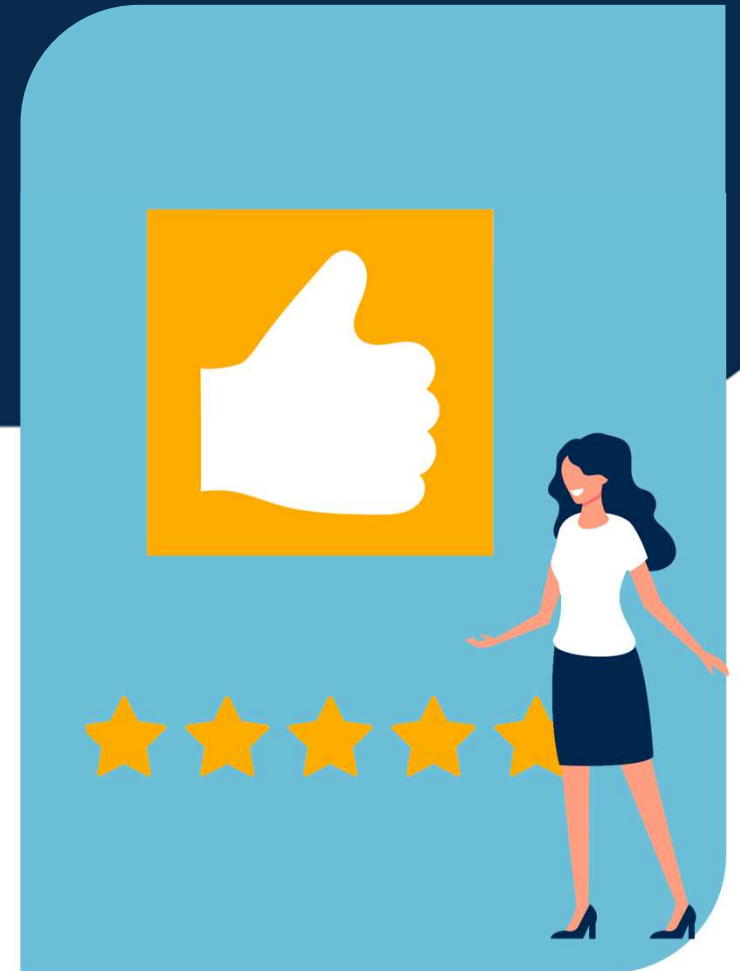


Quality

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

Reputation

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



Basic Principles

Human rights

Banco Fibra recognizes and protects the dignity of all human beings, and human rights govern the way individual human beings live in society and with each other, as well as their relationships with society as a whole.

- ✓ **Commitment to Diversity, Inclusion and Non-Discrimination:** promote respect for differences and equal treatment, repudiating any form of discrimination and conduct that threatens the dignity and diversity of stakeholders, inside and outside the organizational environment
- ✓ **Respect for Labor Rights and Fair Wage Payment:** fully respect labor rights, ensure fair wages, and promote decent work, contributing to a sustainable economy. This practice strengthens the business by reducing risks, turnover, and absenteeism, as well as improving productivity and attracting talent.

The identification of the violation of this principle through discriminatory, prejudiced situations or in which there is dissemination of inconsistent biases, are subject to the appropriate penalties provided for in this Code of Ethics and Conduct.



Princípios Básicos



Social and Environmental Responsibility

- ✓ Collaborate with the communities in which it operates, and contribute as far as possible with **actions favorable to the sustainable development** of society;
- ✓ Recognize their active role in **mitigating the effects of climate change**, continuously seeking to reduce impacts, preserve natural resources, and contribute to a more balanced and resilient future;
- ✓ Comply with social and environmental regulations, including **Fibra's Social, Environmental and Climate Responsibility Policy**.



Watch Your Personal Finances

- ✓ Manage personal finances, including investments, in **a manner compatible with the exercise of function** or link with a financial institution; and
- ✓ **Avoid financial imbalances** by managing personal affairs with careful planning, prudence, and responsibility.

Princípios Básicos



Repudiation of Conflict of Interest

- ✓ Not to use the resources, information or reputation of Fibra or its customers to obtain personal advantages for themselves or for third parties;
- ✓ Not to carry out **external activities that conflict** with the fulfillment of their responsibilities in this institution. Remember that you as an employee have an exclusive contract with Fibra; and
- ✓ Communicate to the Compliance & Sustainability area about the **intention to carry out permitted activities**, such as participation in lectures, events, among others, as a speaker, professor, advisor or mediator. Any **equity interests** must be analyzed on a case-by-case basis by filling out the Conflict of Interest Update Form.

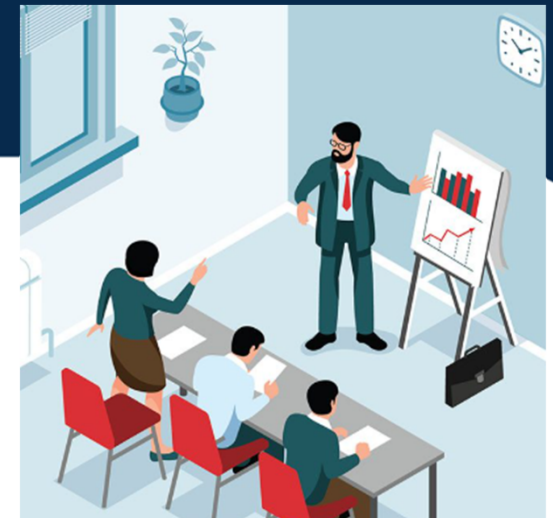
Basic Principles



Relationship with stakeholders

Banco Fibra values ethical, transparent and respectful relationships with all stakeholders, including customers, employees, suppliers, regulatory bodies and society in general. The commitment to integrity is fundamental to building trust, promoting corporate responsibility and contributing to the sustainable development of the business and the environment in which we operate.

- ✓ **Investors:** maintain a transparent, ethical and responsible relationship with its investors, guided by the clear, accurate and timely disclosure of relevant information;
- ✓ **Public authorities:** ensure the availability, accuracy and timeliness of the information provided, ensuring adequate and transparent service to regulatory, inspection and government agencies;
- ✓ **Business partners, suppliers and service providers:** fully comply with legal, tax, socio-environmental and occupational safety obligations. Respect for human rights is essential, and it is also required to repudiate any practice of corruption, fraud or conflict of interest, reinforcing the commitment to integrity and social responsibility in all business relationships.
- ✓ **Clients:** build relationships of trust by offering ethical and sustainable solutions in line with current legislation and the principles of integrity and equity.



Integrity Program



We will better understand in the following pages other **guidelines** that are part of this Code of Ethics and Conduct and come from our **Integrity Program**.

Committed to national and international initiatives to Prevent and Combat Corruption and, mainly, in accordance with Law **No. 12,846/2013**, known as the **Anti-Corruption Law**, Fibra has an Integrity Program approved by the Board of Directors, which encourages an environment of ethical behavior and responsible involvement.

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



Integrity Program



This governance comprises the Ethics Committee and the Compliance, AML/FTP and Social, Environmental and Climate Risks Committee, which also cover topics related to the Integrity Program:



Ethics Committee:

It promotes the ethical culture in Fibra and its subsidiaries, approving related policies and deliberating on issues of personal and professional conduct of its employees and third parties, in order to provide an upright and healthy work environment.

Compliance, AML/TFP and Social, Environmental and Climate Risk Committee:

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



Rules for receiving gifts and gifts



As a way of preventing unlawful acts, and as a consequence, in compliance with the anti-corruption rules, which provide for the objective administrative and civil liability of legal entities for acts against the public administration, national or foreign, gifts and/or gifts may **only** be offered/received to public administration agents **that involve meals in the business context and/or gifts that contain the logo of the person providing the gift** (corporate gifts) and provided that they do not exceed **R\$350.00 (three hundred and fifty reais)**.

National or Foreign Public Agent:

Communicate Compliance: Any intention to offer or receive gifts, gratuities, courtesies or gifts from entities related to the public administration, customers, commercial partners, third-party service providers or even the general public, which exceed the **amount of R\$ 350.00** (three hundred and fifty reais), or are not in accordance with the rules of this Code, must be informed to the Compliance & Sustainability area by email "compliance.regulatorio@bancofibra.com.br"



Relationship with the Public Sector



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

The relations and contacts maintained by Fibra with the **Public Sector and its agents**, regardless of the body, position held or hierarchy of the agent, their family members (spouse, daughters, mother, father, stepfather, stepmother, sisters, grandparents, grandfathers, sisters-in-law or mothers-in-law) or advisor(s) require that the administrators, collaborators or representatives acting on behalf of Fibra, **apply transparent procedures, including good faith, adequate accountability, as well as compliance with the provisions of the law.**



It is also mandatory, in relations with the Public Sector, to **comply with the criteria set forth in Fibra's policies** regarding controls for the prevention of money laundering and combating the financing of terrorism (AML/FPT), as well as to observe the procedures established in the Internal Anti-Corruption and Public Sector Relationship Regulations.

The rules are applicable to business relations with a public entity, whether as a customer, in **the contracting of products and services, as well as in the provision of services or commercial partnership.**

Relationship with the Public Sector

Fibra expressly prohibits the provision of any undue advantages—financial or otherwise—to public officials. Accordingly, it is strictly forbidden for administrators, employees, or third parties acting on behalf of the institution to engage in such practices.



If you become aware of any non-compliance with the guidelines governing interactions with the public sector, promptly contact the Compliance & Sustainability team or report the issue through the Alô Ética Channel !



Offering undue advantages to authorities, public officials, or candidates for public office—**whether to facilitate business dealings**, fulfill legal obligations, or expedite procedures—is strictly prohibited. Such actions are considered acts of corruption and constitute legal violations;



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



Refrain from **making political statements or derogatory remarks** aimed at gaining favor or personal benefit, as such behavior may compromise relationships that must remain strictly professional and business-oriented.



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

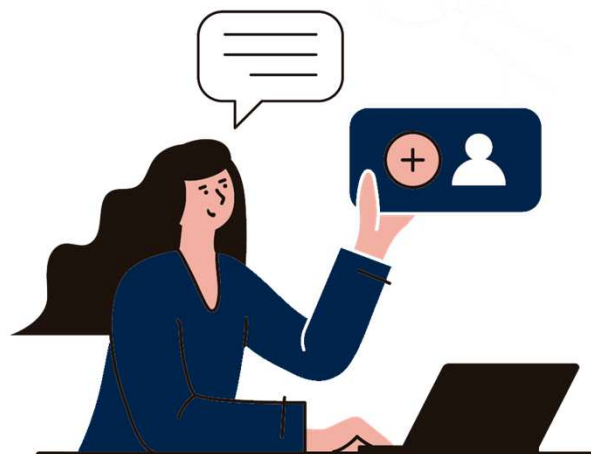


Do not comply with or circumvent the guidelines established in the Anti-Corruption, Competition and Public Sector Relationship Policy.

Our Reporting Channels



Canal Alô Ética



The Alô Ethics Channel aims to serve customers, users, employees, partners, suppliers or service providers who want to report anonymously or not, any unlawful acts, including those provided for in **Anti-Corruption Law No. 12.846/13** related to corruption, fraud, money laundering, as well as bad behavior, sexual or moral harassment, racism, homophobia, among others.

The channel can also be used to record situations that violate Human Rights or that involve activities carried out by Banco Fibra with the potential to cause environmental degradation, in addition to attitudes that may violate the guidelines of this **Code of Ethics and Conduct**.



E-mail:

bancofibra@aloetica.com.br



Telephone

0800 718 2837



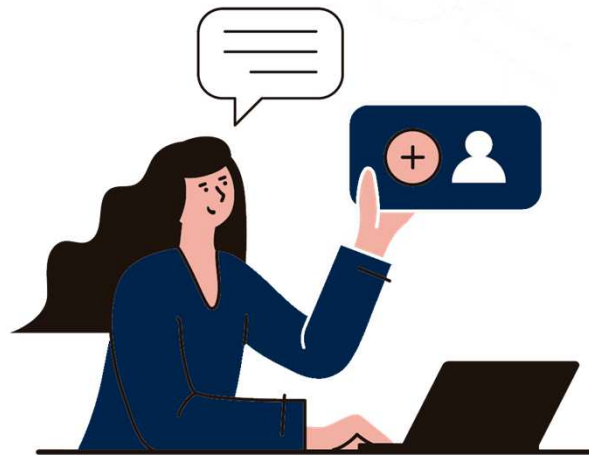
Form:

aloetica.com.br/bancofibra

Our Reporting Channels



Canal Alô Ética



- ❑ Whistleblowers acting in good faith are guaranteed confidentiality regarding any reports of violations of this Code.

To ensure impartiality in the treatment of communications received and the non-retaliation or non-embarrassment of the whistleblower, the management of the channel is carried out by a third-party company specialized in whistleblowing channels. In addition, the complainant can follow up on the complaint at any time, consulting the protocol generated at the time of the report on the Channel's website.



When in doubt, speak up—report it!

Our Reporting Channels



Women's Support Channel

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



E-mail: apoioamulher@bancofibra.com.br

Press and Social Media Statement

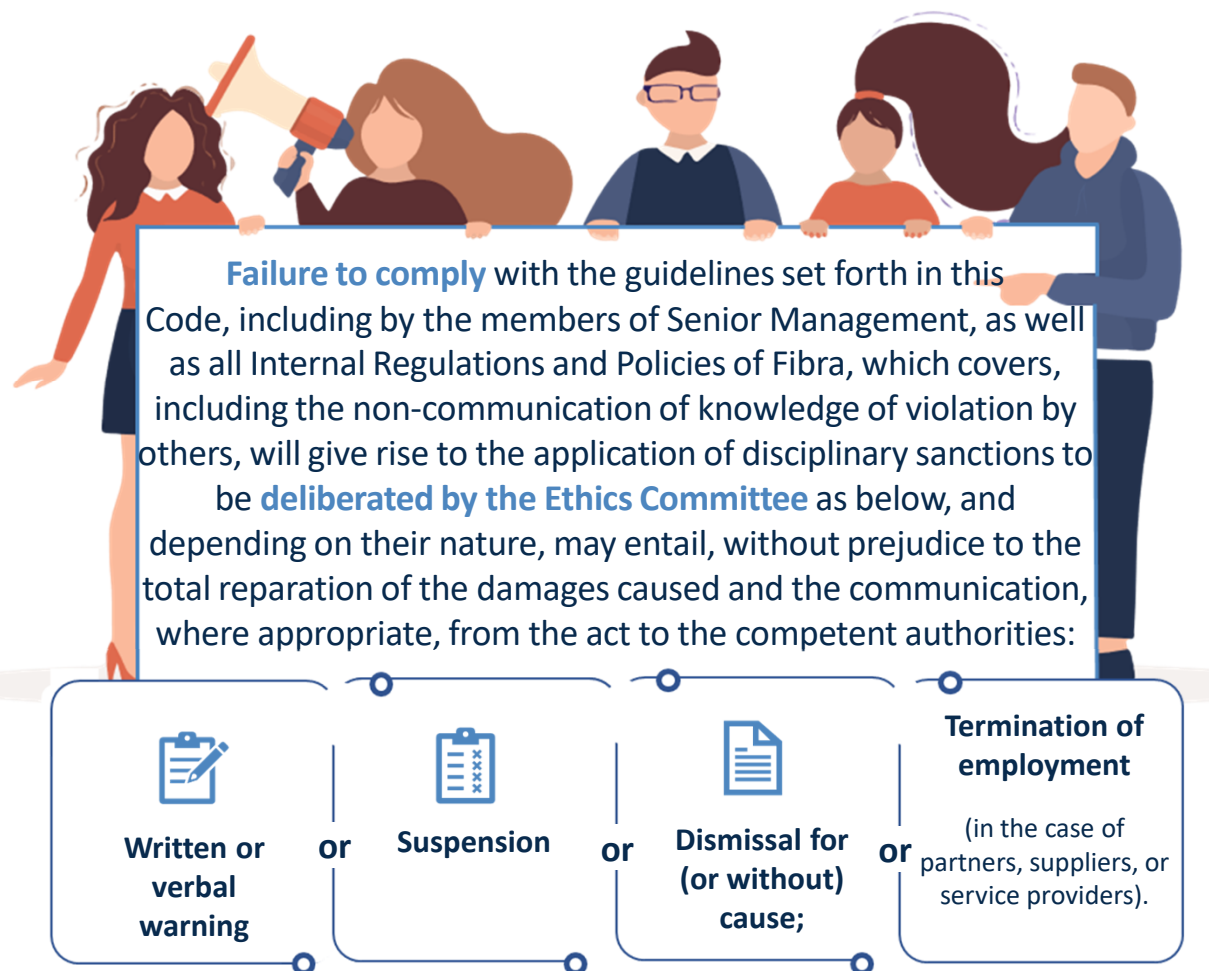
The employee must contact the Customer and Marketing area in advance, in cases where it is necessary to make any statement or **disclose any information about or on behalf of Fibra, through the Press, Social Networks, Articles/Cases, participation in Events or any means of communication.**

Also, the employee must be careful when declaring their personal opinions on social networks or other forums so that they are not confused with the official opinions of Fibra.

Any type of discrimination, harassment and abuse on social networks, even when not directly related to the company, are not tolerated by Fibra.



Disciplinary Sanctions



- ❑ The whistleblower is assured of the confidentiality of the complaints received regarding violations of this Code.

In addition to the disciplinary measures outlined, non-compliance with the provisions of this Code may lead to the attribution of civil and criminal liability



Management and Governance of the Code of Ethics and Conduct



Compliance & Sustainability Area:

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

Ethics Committee:

Resolve on situations involving non-compliance with any guideline related to this Code of Ethics and Conduct.

Approval of this Code of Ethics and Conduct:

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



Associated Rules:

- 01-07-02/1 Compliance;
- ✓ 01-07-04/1 Anticorrupção, Concorrencial e Relacionamento com o Setor Público;
- ✓ 01-07-19/1 Organização de Comitês;
- ✓ 01-07-27/1 Política de Direitos Humanos;
- ✓ 01-09-07/1 Segurança Cibernética;
- ✓ 01-03-08/1 Gerenciamento do Risco Reputacional;
- ✓ 01-07-18/1 Política de Responsabilidade Social, Ambiental e Climática (PRSAC);
- ✓ 01-10-03/1 Canal Alô Ética; e
- ✓ 01-14-20/1 Diversidade e Inclusão.

Annexes that make up this Code of Ethics:

- ✓ [Ficha de Atualização de Conflito de Interesses](#)
- ✓ [Código de Ética, Conduta e Integridade para Terceiros](#)
- ✓ [Programa de Integridade;](#)

BANCO
FIBRA

**We count on
you!**



Do you have any questions? Don't hesitate
to contact our Compliance & Sustainability
team via email
compliance.regulatorio@bancofibra.com.br

