



Code of Ethics and Conduct

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Message of the President

Our culture is characterized 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, which are grounded in ethics, transparency, trust and integrity.

In line with these ethical values, the Fibra's Integrity Program aims to ensure the adequacy, strengthening and effectiveness of the institution's internal control system, seeking to comply with laws, regulations, internal regulations in its 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.

Enjoy the reading!

Arno Schwarz

President of
Banco Fibra



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

Target Audience and Description

Companies, like people, have their own unique characteristics. For this reason, the codes of conduct and ethics define its way of acting in the market and the expectation of behavior of its employees and other outsourced service providers but respecting the individual characteristics of each one.



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 Board Members, Executive Officers (together with the Directors, called "Senior Management"), Employees, Partners, Suppliers, Regulator(s), Self-Regulator(s) and Service Providers(es). 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.

The Fibra Way

Our purpose is Financial Solutions made for you to get there! This motivates us to do more and better for our customers. We have four attributes that configure our Way Meet them on the side.



**Fibra
Makes it
Happen**

We are driven by attitude and delivery. We don't stagnate, we roll up our sleeves, face challenges together and get our hands dirty as a team. We have the grit, persistence, and focus to make it really happen ò because we know that success is the result of collaboration and collective work. It is this fiber that has brought us here ò and it is with it, united, that we move forward



**Support as a
partner, care as
an owner**

We are close, we understand the risks and share the pain. More than customers, we have partners. We act with responsibility, commitment and empathy, as if we were taking care of our own business. Because we know that trust is a long-term investment.



**Ready for
whatever you
need**

Being by the customer's side is more than solving quickly - it is being available when they need it most. We don't act at any cost, we do what is right with clear answers and attitudes that make a difference. We work with agility and transparency, without losing care. We are as big as the customer's challenge requires. Because we know that being ready is being together.



**Today Is as
Important as
Tomorrow**

Our gaze is always ahead. We think with a long-term vision, anticipating movements and creating solutions that help our partners grow consistently. We are always attentive, restless and ready for what is coming, with an open mind to new ideas, listening and observing what is to come. Because those who undertake need a bank that sees the future together.

Core 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.

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



Ethics



Integrity



Repudiation of illicit practices



Confidentiality and Information Security



Quality



Reputation



Humans Rights



Social and Environmental Responsibility



Watch Your Personal Finances



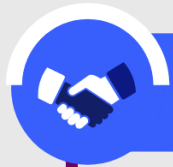
Prevention of Conflict of Interest



Stakeholders Relationships

Core Principles

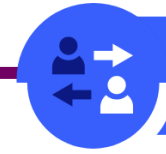
Now, let's detail the principles of our Code of Ethics and Conduct and the behavior expected for each of them:



Ethics

- Build sustainable and long-lasting partnerships and relationships, in accordance with applicable laws and in compliance with our corporate guidelines;
- Practice clear and open dialogue, aiming at a constructive, healthy and collaborative environment; and
- Act according to institutional guidelines and values
- Maintain personal and professional ethics in accordance with the behavioral parameters expected and described in this Code.





Integrity

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





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 practice any illegal activities, including, but not limited to, those resulting from corruption, bribery, money laundering, internal or external fraud, directly or indirectly arising from professionals, partners, suppliers and providers of services acting on behalf of this institution;
- 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.
- 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





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 Brazilian 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;
- 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.





Quality

- Provide products and services of the highest quality, in accordance with the best market practices and according to the profile of each customer;



- 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;
- Obtain the results in an honest, fair, legal and transparent way.



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.





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
- Prevent financial imbalances by managing personal affairs with planning, prudence and responsibility.

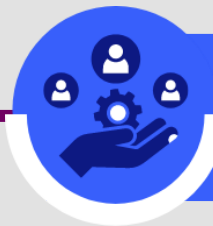


Prevention of Conflict of Interest

- Not use Fibra's resources, information or for personal gain.
- Ç Avoid external activities that conflict with their responsibilities at Fibra. Remember that you as an employee have an exclusive contract with Fibra; and

Inform Compliance & Sustainability of permitted external activities, such as participation in lectures, events, among others, as a speaker, professor, advisor or mediator. Any equity participation must be analyzed on a case-by-case basis by filling out the Conflict-of-Interest Update Form.

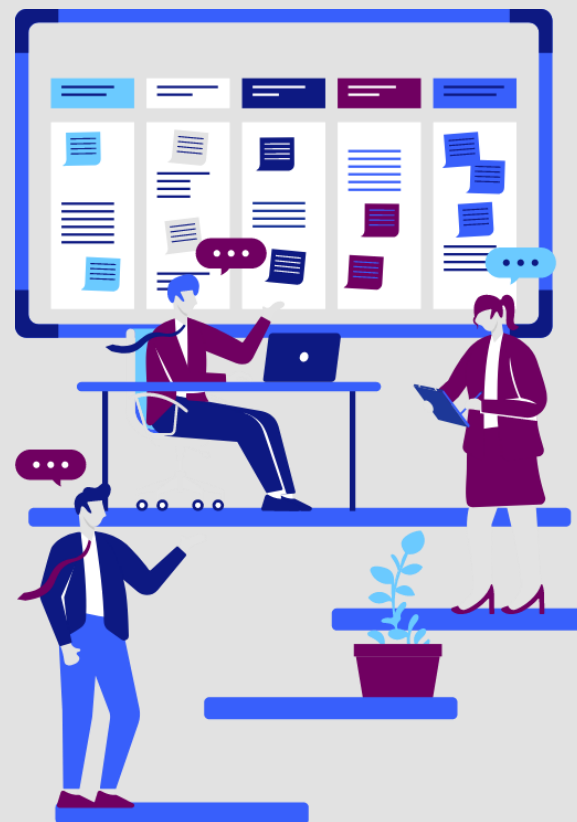




Relationship with stakeholders

Banco Fibra values ethical, transparent and respectful relationships with All stakeholders, including customers, employees, suppliers, regulators and self-regulators 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 material information.
- **Business partners, suppliers and service providers:** fully comply with legal, tax, socio-environmental and occupational safety obligations. Respect for human rights is essential, and the repudiation of any practice of corruption, fraud or conflict of interest is also demanded, reinforcing the commitment to integrity and social responsibility in all business relationships.
- **Public Sector:** ensure the availability, accuracy and timeliness of the information provided, ensuring adequate and transparent service to regulatory, inspection and government agencies.
- **Clients:** build relationships of trust by offering ethical and sustainable solutions in line with current legislation and the principles of integrity and equity.
- **Employees:** Respect and value employees, promoting an environment of ethical, inclusive, safe and collaborative work, based on mutual respect, integrity, equal opportunities and continuous professional development.



Integrity Program

Will we 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's 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.

1

Ethics Committee:

It promotes an 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.

2

Compliance, AML/FTP 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

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, hospitality or gifts?

GENERAL PUBLIC

Maximum value of
R\$ 350,00

Senior management, employees and service providers acting on behalf of Fibra, may only receive gifts and hospitalities according to the characteristics mentioned above, which do not exceed the amount of R\$ 350.00 (three hundred and fifty reais).

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



Travel



Training and courses of any nature



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)

Report to Compliance!

- Any intention to offer or receive gifts, hospitalities, courtesies or gifts;
- From entities related to the public sector, customers, commercial partners, third-party service providers or even the general public;
- That exceed the amount of R\$ 350.00 or are not in accordance with the rules of this Code
- The Compliance & Sustainability area must be informed through the e-mail box:



compliance.regulatório@bancofibra.com.br

Rules for receiving gifts and hospitality

As part of the Company's commitment to preventing improper conduct and complying with applicable anti-corruption laws, which impose strict administrative and civil liability on legal entities for acts against domestic or foreign Public Administrations, gifts and hospitality may only be offered to or accepted from public officials if they are limited to business-related meals and/or modest corporate-branded gifts. Such gifts or hospitality must not exceed BRL 350.00 (three hundred and fifty Brazilian reais) in value and must not be intended to improperly influence any decision or obtain an undue advantage.

National or Foreign Public Agent



Business meals



Corporate gifts with the supplier's logo



as long as not exceed R\$350.00

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 position held or hierarchy of the agent, their family members (spouse, daughters, mother, father, stepfather, stepmother, sisters, grandparents, grandmothers, sisters-in-law or mothers-in-law or advisor(s) require that administrators, employees 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/FTP), as well as to observe the procedures established in the Internal Anti-Corruption, Competition 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 granting of undue advantages, economic or otherwise, to public officials, and, therefore, it is strictly forbidden that administrators, employees or third parties acting on behalf of the institution:

- ❌ Entice authorities, public officials and candidates for public office through undue advantages, either to facilitate business, or to comply with legal obligations or speed up routines. Such practices are considered corruption and constitute legal infractions.
- ❌ Make comments of a political nature or of any derogatory order for obtaining and benefiting, which compromise the maintenance of relationships that must be mandatorily commercial.
- ❌ Use sponsorships or personal political donations to obtain undue benefits for the institution, for themselves or others.
- ❌ 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.**



When faced with evidence non-compliance with the established guidelines for relations with the public sector, immediately contact the Compliance & Sustainability or report to Canal Alô Ética.!

Reporting Channels

Canal Alô Ética

The Canal Alô Ética 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.



Telephone:
0800 718 2837



E-mail:
bancofibra@aloetica.com.br



Web:
aloetica.com.br/bancofibra

Reporting Channels

Canal Alô Ética

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 Canal Alô Ética's website.

The whistleblower in good faith is assured of the confidentiality of the complaints received regarding violations of this Code.

Remember:
When in
doubt,
report it!



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 People and Culture area and/or by our occupational physician.

Communication is by email and the 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

Failure to comply with the guidelines set forth in this Code, including by members of Senior Management, as well as with all Fibra's Internal Regulations and Policies, which includes the failure to communicate knowledge of violation by others, will give rise to the application of disciplinary sanctions to be resolved by the Ethics Committee as follows, and depending on their nature, may entail, without prejudice to the full reparation of the damage caused and the communication, if applicable, of the act to the competent authorities:

- Written or verbal warning;
- Suspension;
- Termination (or without) cause; or
- Termination of the relationship (in the case of partners, suppliers, or service providers).

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



Additionally, without prejudice to the disciplinary sanctions mentioned, failure to comply with the provisions of this Code may subject the determination of responsibilities in the civil and criminal spheres.

Management and Governance of the Code of Ethics and Conduct

Compliance & Sustainability Area:

The Compliance & Sustainability 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; e
- ☐ People and Culture Area.



Associated Policies:

- ✓ 01-07-02/1 Compliance;
- ✓ 01-07-04/1 Anti-Corruption, Competition and Public Sector Relations;
- ✓ 01-07-19/1 Organization of Committees;
- ✓ 01-07-27/1 Human Rights Policy;
- ✓ 01-09-07/1 Cyber Security;
- ✓ 01-03-08/1 Reputational Risk Management;
- ✓ 01-07-18/1 Social, Environmental and Climate Responsibility Policy (PRSAC);
- ✓ 01-10-03/1 Alô Ética Channel; e
- ✓ 01-14-20/1 Diversity and Inclusion.
- ✓ 01-07-08/1-Conflict of Interest Prevention

- Ç **Supplemental of Code of Ethics:**
- Ç Integrity Program;
- Ç Conflict of Interest Update Form
- Ç Code of Ethics, Conduct and Integrity for Third Parties

We count on you!

Do you have any questions?

Contact Compliance & Sustainability team via email



compliance.regulatório@bancofibra.com.br

