



# Safrá

Tradição Secular de Segurança

## **Banco Safrá S.A.**

### **Corporate Integrity Program Policy**



## 1. Objective

The corporate policy of the Integrity Program, hereinafter referred to as the POLICY, has the objective of preventing injury to domestic or foreign public administration, by specifying parameters that shall be observed in the relationship with all members comprising public administration. The POLICY also reflects the commitment of the Senior Commitment of Safrá Conglomerate to the principles described in this document underlying its management and business conduct, as well as to the unrestricted respect for Public Administration.

## 2. Guidelines

### 2.1. Scope

The following are subject to this POLICY:

- I. All companies that belong to the Prudential Conglomerate and its subsidiaries, according to the corporate structure in effect, hereinafter referred to as SAFRA;
- II. All employees, regardless of their jobs or duties;
- III. All suppliers, service providers, intermediary agents, and associates.

### 2.2. Definitions

#### **Public Administration**

Any and all body, company, agency or official representative, either direct or indirect, of the Executive, Legislative and Judiciary branches, in federal, state, or municipal level, or foreign.

#### **Government employee**

For the purposes of this document, is the one who serves or take, even temporarily or without pay, by election, nomination, designation, employment or any kind of investiture or tie, a term of office, job, employment, or duty in a domestic or foreign public administration entity.

#### **Injury**

Any act performed to harm domestic or foreign government asset, the principles of public administration, or the commitments assumed by Brazil, as provided in the Law 12,846/2013 –Law on Corruption Combat, in Law 8,666/1993 – Law on Bidding, and Law 8,429/1992 – Law on Administrative Impropriety.

### 2.3. Relationship with the Public Administration

SAFRA's relationship with public administration, as provided in its Corporate Code of Ethics, may only be established upon explicit nomination.

Any and all relationship or activity that involves the participation or interaction of those who are subject to this POLICY with government employees shall be guided by:



- Corporate and professional ethics;
- Commitment to the guidelines provided in SAFRA's Code of Ethics, as well as of its segments;
- Knowledge and full compliance with the policies and internal normative documents applicable to the activity; and
- Knowledge and full compliance with the legislation and regulation applicable to the activity.

It is also a responsibility of all of those included in the scope of this policy, in the activities involving the participation or interaction with government employees, for making efforts towards the mitigation of any risk to which SAFRA may be exposed, especially the Legal, Operational and Reputational Risks.

Any collaborator of SAFRA, regardless of her/his job or duty, is prohibited from the following:

- Suggesting, offering, granting, promising free offers, gifts, contributions, favors, or invitations to entertainment to government employee(s) or persons related to the latter, public sector companies, third sector, government bodies, current or prospect customers, aiming at facilitating SAFRA's businesses, operations, and activities, or inappropriate benefits for oneself or third parties;
- Performing acts to promise, offer, or give, either directly or indirectly, unfair advantage to domestic or foreign government employee, or person related to the latter;
- Committing fraud in bids and contracts with the domestic or foreign government;
- Offering unfair advantage to competitor/bidder;
- Hindering the action performed by inspection authorities.

Any type of SAFRA's business, operations and activities that has as counterparty the public sector and involves high-risk activities shall be submitted to special attention procedures, with the determination of differentiated approval levels.

## **2.4. Reporting Injuries to Public Administration**

Those included in the scope of this POLICY undertake to timely and immediately report to the Permanent Conduct and Integrity Group any act or suggestion of act that may cause injury to public administration, performed or proposed by employees, outsourced service companies, and/or their employees, government employees and/or their representatives, so that such fact is promptly verified, interrupted and the appropriate corrective actions are adopted.

The reporting shall be made as follows:

- E-mail: [canal.anticorruptcao.combateilicitudes@safra.com.br](mailto:canal.anticorruptcao.combateilicitudes@safra.com.br) ou [canal.anticorruptcao.combateilicitudes@combateilicitude.com.br](mailto:canal.anticorruptcao.combateilicitudes@combateilicitude.com.br);
- Complete the form (with anonymous option) available on the Institution's Intranet and Internet;
- Letter addressed to the head office of Banco Safra, to the attention of the Permanent Conduct and Integrity Group.

Any and all reporting shall have the whistleblower's identity preserved, so that the latter is not subject to retaliation, and all information sent shall be treated as confidential by the Permanent Conduct and Integrity Group. The sanctions established for the breaches of the provisions, in this policy, are described in the Policy of the Permanent Conduct and Integrity Group.



## **2.5. Ensuring Integrity and the Integrity Program**

The General Superintendence of Operational Risks is held responsible, on independent basis, for structuring, implementing, monitoring and managing internal actions that ensure the integrity of the activities and businesses carried out by SAFRA, or on behalf of SAFRA, with special attention to the prevention of injuries to public administration. Such actions will be consolidated, shaping the Integrity Program of SAFRA.

Autonomous actions may be taken by the internal areas of the conglomerate in the scope of their own internal controls. However, in case any specific measure is taken aimed at ensuring integrity, the area shall timely inform such action to the General Superintendence of Operational Risks, which will include it in the Integrity Program.

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Este documento é uma versão resumida para efeitos de publicação externa.