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## 1. Code Of Ethics and Conduct Purpose

The purpose of the Code of Ethics and Conduct is to provide basic guidelines from Senior Management regarding the personal behavior required by Banco Fibra S.A. ('Banco Fibra'), establishing standards of conduct and ethics on the several issues that may pose conflict situations and/or risks to the institution.

## 2. Target Audience

- Banco Fibra S.A., controlled companies and their suppliers.

## 3. Message from the President

Our culture is marked by optimism, commitment to Brazil's growth and a strategic vision that aims at our business long-term sustainability. We position ourselves as a Bank made of people for people who believe, have an entrepreneurial spirit, take risks, and help on the development of our country.

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

According to these ethical principles, Banco Fibra's Integrity Program comprises ensuring the adequacy, strengthen and functioning of the institution's internal control system, complying with laws, regulations and internal regulations in its relations with clients, employees, suppliers and business partners.

This Code of Ethics and Conduct, one of the pillars of the Integrity Program which reinforces our purposes, demonstrates the role that each individual must play in ensuring an environment of trust, endorsed by ethical decisions and values, which support the integrity and reliable construction of this institution.

Good reading!

**Arno Schwarz**

## 4. Description

Companies, as well as people, have their own unique characteristics. For this reason, codes of ethics and conduct define the way they operate in the market and the expectation of behavior of its employees and other service providers.

This policy, named Code of Ethics and Conduct, brings together the guidelines that must be observed by the professionals and service providers of Banco Fibra and its subsidiaries aiming at high standards of conduct in the exercise of our activities. It reflects the cultural identity and commitments made in the markets in which Banco Fibra operates.

In addition, it aims to guide the conduct and decisions of managers, employees, suppliers and service providers in the fulfillment of their attributions.

## 5. Our Culture

The Banco Fibrá's purpose **is to resolve the present for the people who are making tomorrow**. This motivates us to do more and do better for our clients.

Our Way of doing things has four essential attributes:

- **We have our clients vision**: We know, understand and respect the challenges of those who produce in Brazil. We honor the commitment we have to our clients and deliver the best service in an unbelievable quick way. Our attitude is always positive and constructive, as we believe that to be good, a deal needs to be good for all parties.
- **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 makes dialogue easier by removing of the political aspects of our corporate life. We cultivate a respectful and reliable environment for dialogue, solving the problems with constructive criticism and hiding no errors.
- **We are leaders and we make it happen**: we have the determination, perseverance and resilience to turn ideas into a business reality. We compete for our client and are accountable for all initiatives we are involved in. We innovate and are always close.
- **We recognize people's excellence, always**: we believe that a company with the best people delivers the best services and creates the best solutions. We always challenge ourselves to make the best ideas grow and prosper. We always seek to go beyond and are recognized for our deliveries.

Our purpose strengthens us, brings clarity about the identity of our organization and presents to the market how we want to be recognized. The daily practice of the Our Way attributes is what we long for and shall pursue on a day-to-day basis.

## 6. Basic Principles

The ethical principles that guide the actions of Banco Fibrá's professionals and their service providers also underpin the image of a solid and reliable company to our clients, partners, employees and supervisory bodies. Hence, the Bank defined the principles of the Code of Ethics and Conduct, as follows:

- **Ethics**
  - Act in line with institutional guidelines and values, based on moral values;
  - Build sustainable and perennial partnerships and relationships, within the strict limits of local laws and in compliance with our corporate guidelines;

- Practice clear and open dialogue, aiming at a constructive and enriching environment; And
- Maintain the required personal and professional ethics, as well as the behavioral parameters that should guide the conduct of employees and service providers.

- **Integrity**

- Demonstrate standards of honesty, responsibility and impartiality in professional conduct in our work;
- Be honest in our business and professional and personal relationships, so that no act will harm the reputation of Banco Fibra and its subsidiaries;
- Adhere to the rules and laws applied to our business;
- Refrain from illegal, fraudulent or unethical behavior, especially in relation to financial and/or commercial negotiations, as well as in relation to the laws and regulations that affect us; And
- Promote egalitarian treatment in relationships, avoiding favoritism or persecution.

- **Repudiation of Illicit Practices**

- Comply with national and foreign laws, regulations and standards, in addition to Bank's internal policies, in order to follow the standards of conduct that Banco Fibra maintains with regulators, clients and society.
- Any illegal practices, including corruption, money laundering, internal or external fraud, coming from professionals and service providers acting on behalf of the institution are prohibited.
- The guidelines of Anti-Corruption Brazilian Law No. 12.846/13 must be complied with, so that Banco Fibra expressly prohibits the practice of acts against public administration, national or foreign.
- Banco Fibra repudiates any form of sexual harassment and bullying.

- **Confidentiality**

- Maintain strict confidentiality in relation to clients, employees, service providers and also to the information, news and records of Banco Fibra and the persons mentioned in this item;
- Safeguard the confidentiality and privacy of the personal and financial information of its clients, maintaining, where applicable, the information provided by its customers as confidential, and therefore not being allowed its transmission to third parties, except by express and prior consent of the client; And
- Maintain, even after the breach of the commercial ties, for any reason, the confidentiality and confidentiality of the information.

All employees are responsible for the custody of documents related to their activities and must therefore ensure that confidential information is not exposed to other professionals or third parties in transit during periods of absence from their physical place of work.

- **Quality**

- Strive to provide the highest quality products and services, in accordance with the best market practices;  
And
- Seek to perform its functions following the highest standards of excellence.
  
- **Reputation**
  - Seek continuous development, high performance and, especially, client satisfaction; And
  - Seek results on a honest, fair, legal and transparent way.
  
- **Beware of Personal Finances**
  - Manage personal finances, including investments, in a compatible manner with your work on a financial institution;
  - Avoid financial imbalances, managing personal or family businesses with planning, prudence and responsibility, avoiding moral, psychological, professional and social losses; And
  - Refrain from using inside information in conducting your personal finances, following legislation, internal regulations and restraining public information in the management of investments, financing and personal loans.
  
- **Social Responsibility**
  - Act with commitment to the communities in which operates, and contribute to actions favorable to the society development.
  
- **Repudiation of Conflict of Interests**
  - Comply with all legal and regulatory requirements related to conflict of interest;
  - Avoid all circumstances that may cause conflicts or the appearance of conflicts between your personal interests and those of the Bank; And
  - Stop using the organization's resources or reputation to gain personal benefits and avoid external activities or influences that clash with the fulfillment of its responsibilities or harm them, or even imply that this may be occurring.
  
- **Repudiation of Prejudice**
  - Repudiate attitudes guided by prejudices related to origin, ethnicity, religion, social class, gender, color, age, physical limitations and any other forms of discrimination.

## **7. Press Statement**

Banco Fibra and its subsidiaries seek to maintain a discreet stance regarding written-spoken and televised statements. There is no interest in being on evidence in the media.

In cases where it is necessary to make statements in the press, through any media, as well as publish articles prepared by employees who mention Banco Fibra, there must be a prior approval of the Board (or one of its members).

## **8. Client Information**

A "Confidential information" is considered to be all information inherent to clients, such as balances, statements, loan positions, investment positions, collateral position, securities portfolio, registration data, accounting analyses, signature cards, power of attorney, agreements, authorizations, magnetic files in general and any other information that characterizes the breach of bank secrecy, according to the law and specific regulations of the Central Bank of Brazil.

Client registration information may only be provided to third parties, provided that it is formally authorized by the client, in compliance with the provisions of the regulations in force.

The rules on how to handle sensitive information are set out in the Internal Cybersecurity Policy.

## **9. Information Security**

In order to preserve Banco Fibra's internal equipment and information, it is necessary to comply Banco Fibra's Information Security rules.

The employee must, among others:

- Make a good use of Banco Fibra's passwords and e-mail;
- Observe the internal rules of software use;
- Be aware that telephone conversations can be recorded, at the sole discretion of the Bank; And
- Do not expose or disclose the name of Banco Fibra on social media and/or the Internet.

The e-mail, like any other corporate tool, is subject to monitoring, is prohibited to send information owned by Banco Fibra to external emails, even to the employee's personal e-mail.

The rules dealing with this issue are set out in the Internal Cybersecurity Policy.

## **10. Integrity Program**

Banco Fibra is concerned with preserving its high standards of ethics and conduct. Therefore, the Integrity Program ensures, through its principles, the adequacy, strengthening and functioning of the institution's internal

control system, seeking to comply with the law and regulations, besides managing compliance risks, together with the Senior Management.

Below are some of the principles of the Integrity Program. It is important that all employees, suppliers, service providers or those who act on behalf of the institution, pay attention to all principles, which are set out in the document called "Principles of the Integrity Program" attached to this Code, as well as on the institutional website of Banco Fibra.

### **10.1. Gifts and Contributions**

The institution considers as gifts and contributions: training and courses of any kind; travel, meals (when they are not for business), festivities and events related to festivities (holidays and other events), beverages and souvenirs that do not contain the logo of the person supplying the gift, and gifts that have no relationship and/or logo of its issuer.

- **Rule for the General Public:** Banco Fibra's managers, employees and service providers can only receive gifts if do not exceed the amount of R\$ 100.00 (one hundred reais), and due to specific and exceptional reasons (for example, such as Christmas or wedding gifts).
- **Rule for Public Administration:** As a way of preventing illicit activities, and as a consequence, in compliance with anti-corruption rules, which provide for the direct administrative and civil liability of legal entities for acts against public administration, national or foreign, only gifts may be offered to the public administration those who do not exceed the amount of R\$ 100.00 (one hundred reais).

Any violations must be reported to the compliance violations whistleblower Channel ("Canal Pró-Ética do Banco Fibra") that analyses aware of the non-compliance with the above-mentioned rules.

Identified or reported violations of the gifts policy, without prior consultation to Compliance, will be submitted to Compliance and Human Resources area, and if applicable, escalated to the Compliance, Money Laundering and Socio-Environmental Risks Committee for decision.

### **10.2. Relations with Public Sector**

In case the relationship between the Bank and public agents, their family members (spouse, children, parents, stepfather or stepmother (if applicable), siblings, grandparents, brothers-in-law or in-laws) or advisors is needed, it is essential that employees act transparently, respecting the ethical standards and conduct of the institution, in addition to complying with the the law.

As in the relationship with other market participants, in the case of a relationship with the public sector, regardless of the business relationship, direct or indirect, as well as the employee's area or position, the following guidelines should be observed:

- It is strictly prohibited to promise, offer, receive, accept, and request, directly or indirectly, undue advantage to a national or foreign public agent, or a third person associated with it, whether or not related

to acts of money laundering, terrorist financing, corruption, fraud and any other act considered unlawful, pursuant to Anti-Corruption Brazilian Law No. 12.846/13.

- It is prohibited to any person, or organization acting on its behalf, to give or offer bribes to any public agent in order to gain a business favorable decision. We understand bribery or bribe, as the act of promise, offer or pay to an authority, governor, public agent or a private sector professional, any values or favors so that the person ceases to behave on an ethically manner with his professional duties.
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- Any communication with public agents, whether for conducting business or any other type of commercial relationship, must be carried out exclusively through institutional channels, as per the other Bank segments. Likewise any financial transaction must be formalized through a valid contractual instrument, as per Banco Fibra's Legal area.

In cases where the employee or third party discovers evidence of corruption, conflict of interest or any other act that may be characterized as illicit during the relationship or negotiation with the Public Sector, Compliance shall be immediately informed or information shall be reported to the Canal Pró-Ética .

Banco Fibra is at the Public Administration disposal to support and cooperate with any possible investigation of suspected irregularities, or law or ethical principles violation, always in strict compliance with current legislation.

## **11. Ethics Committee**

Banco Fibra's Ethics Committee is responsible for managing, disseminating, updating and applying this Code, as well as for analyzing and deliberating on cases of violation, and to resolve doubts about the text interpretation.

The members of the Ethics Committee, purpose, , agenda and scope of deliberations are described in the Organization of Committees internal policy.

## **12. Reporting Channel (“Canal Pró-Ética”)**

The Banco Fibra has a compliance violations whistleblower Channel (“Canal Pró-Ética”), which aims to receive and investigate complaints of all who witness, or want to report, anonymously or not, acts that characterize corruption, fraud, bad behavior, sexual harassment, bullying, unethical activities, among others. Canal Pró-Ética can be contacted through e-mail at [canal.proetica@bancofibra.com.br](mailto:canal.proetica@bancofibra.com.br), and anonymously, as per the whistleblower desire, through the Intranet (employees) and the institutional website.

Comments, change suggestions or communication of any violation or conduct contrary to this Code by employees, suppliers of goods and service providers, or any third party that may be related to Banco Fibra, shall also be sent to the e-mail [Internal Audit e-mail \(canal.proetica@bancofibra.com.br\)](mailto:Internal Audit e-mail (canal.proetica@bancofibra.com.br)), or communicated in person the area members that ensure the confidentiality of the employee.

Internal Audit ensures the confidentiality of any information exchanged and that no retaliation or embarrassment is caused to the whistleblower, as a result of his complain.



### **13. Women's Support Channel**

Banco Fibra also provides a support channel exclusively for all female employees who are experiencing any type of violence (physical, psychological, sexual, patrimonial and/or moral), so they can contact and be assisted by our People Area ("Human Resources") and/or our work physician.

Complaints must be made through the e-mail [apoioamulher@bancofibra.com.br](mailto:apoioamulher@bancofibra.com.br) and confidentiality will be ensured to the whistleblower.

### **14. Disciplinary Sanctions**

Failure to comply with this Code, as well as to all Banco Fibra Internal Policies, which comprises, the non-communication of knowledge of violation by others, will give rise to the application of disciplinary sanctions to be deliberated by the Ethics Committee as below, and depending on its nature, may result, without prejudice to the total reparation of the damages caused, on the communication, where appropriate, from the act to the competent authorities:

- Written warning;
- Suspension; and
- Dismissal with (or without) cause.

The confidentiality of complaints received regarding violations against this Code is ensured.

In addition, without prejudice to the above disciplinary sanctions, failure to comply with the provisions of this Code may subject the determination of liability in the civil and criminal spheres.

### **15. Related Documents**

- Term of Adtake - Code of Ethics and Conduct (employees)
- Term of Responsibility - Conflict of Interest (employees)
- Questionnaire - Conflict of Interest (employees)
- Principles of the Integrity Program

### **16. Related Internal Standards**

- Anti-corruption and Public Sector Relation;
- Monitoring of Requests from Regulatory Solicitations;
- Organization of Committees;
- Cybersecurity; and

- Reporting Channel (“Canal Pró-Ética”)

## **17. Responsibility**

- Legal and Compliance

## **18. Validating Areas**

- Board of Directors
- People Area (Human Resources)