



CORPORATE SOCIAL RESPONSIBILITY MANAGEMENT SYSTEM

1 Introduction

The Corporate Social Responsibility Management System (SGRSC) aims to improve the quality of the relations and conditions of the work environment with employees, collaborators and other interested parties, taking as a reference the Organization's policies, standards and commitments.

With this, Bradesco reinforces its commitment to continuous improvement and fulfills an important step towards the social pillar of sustainability, striving for socially responsible management.

2 Objective and Scope

The Corporate Social Responsibility Management System (SGRSC) covers principles that promote respect for human beings in all its aspects and aims to promote the continuous improvement of the relations and conditions of the work environment, extending the commitment to respect the Rights Human Rights, Children's Rights and Fundamental Labor Rights to its suppliers. It also demonstrates clarity and transparency in relationships, establishing a policy and procedures to manage matters that the Organization may control or influence and to express to interested parties that such practices are in compliance with this Standard, through periodic audits carried out by an independent certifying body, accredited for the subject and hired for that purpose.

This Standard is an instrument for implementing the Organization's commitment, expressed in the Bradesco Organization's Human Resources Management Policy, with the legislation applicable to its activities, principles and fundamental rights in the employment relationship and other subscribed commitments as follows:

- Consolidation of Labor Laws - CLT.
- Regulatory Standards - Occupational Health and Safety NRs.
- Collective Bargaining Agreement for the linked categories.
- Conventions of the ILO (International Labor Organization) ratified by Brazil and applicable to the Organization.
- Universal Declaration of Human Rights.

- United Nations Convention on the Rights of the Child.
- United Nations Convention on the Elimination of All Forms of Discrimination.

3 Management System

The Organization will structure, systematically and through the SGRSC Procedures Manual, the procedures related to the rules established in the Internal Regulation of Bradesco Organization, Bradesco Organization's Code of Ethical Conduct and other rules related to the processes that integrate and/or interact with the SGRSC, ensuring compliance with the Bradesco Organization's Human Resources Management Policy.

The concept of continuous improvement of the Management System is based on a governance model that ensures the commitment of all levels and functions required for its successful implementation. The Organization defines the processes and procedures with the purpose of establishing a management model that monitors the social impacts generated by the Organization's activities with the public with which it relates.

3.1 Planning and Implementation

The representatives of the Management System's areas of competence must prepare the Development and Implementation Plan, which shows the commitment of the Bradesco Organization's Executive Board to the implementation and continuous improvement of the SGRSC.

The Development and Implementation Plan presents the activities related to the maintenance and continuous improvement of the Corporate Social Responsibility Management System. The results of the activities are presented by SGRSC representatives at the critical analysis meetings.

3.2 System Representatives and Responsibilities

RD - Representative of the Board for the SGRSC

Human Resources Department Officer or another employee designated by him, at a managerial level, whose general responsibility is to ensure the management of the SGRSC, by means of:

- a) Participation in the meetings of the Corporate Social Performance Team - EDSC for Critical Analysis of the Corporate Social Responsibility Management System.

b) Administration and monitoring of the actions foreseen in the Development and Implementation Plan in his/her area of competence.

c) Compliance with compliance with regulatory and statutory requirements applicable to his/her area of competence.

d) Approval of the SGRSC procedures under his/her responsibility.

RSSO - Representative of the Occupational Safety and Health Board

Human Resources Department Officer or another employee designated by him, at a managerial level, to respond on aspects of occupational health and safety as defined in the Standard of the Bradesco Occupational Health and Safety Management System and who, among other activities, has the responsibility to ensure compliance with the requirements of the SGRSC, in its area of competence, through:

a) Participation in the meetings of the Corporate Social Performance Team - EDSC for Critical Analysis of the Corporate Social Responsibility Management System.

b) Management and monitoring of the implementation and effectiveness of corrective and preventive actions resulting from action plans, in his/her area of responsibility.

c) Management and monitoring of the actions foreseen in the Development and Implementation Plan in his/her area of competence.

d) Approval of procedures which represent the SGRSC under his/her responsibility.

e) Implementation of actions to promote continuous improvement of the SGRSC in his/her area of competence.

RDCP - Representative of the Equity Conditions Board

Equity Department officer or employee designated by him, at the managerial level, to answer about patrimonial conditions that impact on the work environment, in his/her area of competence, by means of:

a) Participation in the meetings of the Corporate Social Performance Team - EDSC for Critical Analysis of the Corporate Social Responsibility Management System.

b) Management and monitoring of the implementation and effectiveness of corrective and preventive actions resulting from action plans, in his/her area of responsibility.

- c) Administration and monitoring of the actions foreseen in the Development and Implementation Plan in his/her area of competence.
- d) Approval of procedures which represent the SGRSC under his/her responsibility.
- e) Implementation of actions to promote continuous improvement of the SGRSC in his/her area of competence.

EDSC - Corporate Social Performance Team

The EDSC is made up of representatives from the Departments: Human Resources, Equity, Retail and Prime and others that may be related to the issues at hand. Their responsibilities are:

- a) Maintenance and adaptation of processes, when necessary, to ensure compliance with the requirements of this Standard.
- b) Implementation of actions to promote continuous improvement of the Corporate Social Responsibility Management System.
- c) Participation in SGRSC Critical Analysis meetings, considering the issues on the agenda, presentation of results, ongoing actions, plans and goals.

4 Terms and Definitions

For the purposes of this Standard, the definitions and terms related to Corporate Social Responsibility Management System and those specific to the Bradesco Organization apply, as follows:

- a) **SGRSC:** Corporate Social Responsibility Management System.
- b) **Objectives of the SGRSC:** purposes of social responsibility arising from the Bradesco Organization's Human Resources Management Policy, which should be quantified, whenever possible, by means of established targets.
- c) **Opportunity for Improvement:** partial condition of service or possibility of improvement.
- d) **Non-compliance:** not meeting a requirement.
- e) **Corrective action:** action to eliminate the causes of nonconformities to prevent recurrences.
- f) **Preventive action:** action to eliminate the cause and root cause of a potential nonconformity.

g) **Employee:** professional with an employment relationship with the Bradesco Organization.

h) **Collaborator:** third party, service provider.

i) **Supplier:** any Legal Entity in the supply chain that directly supplies goods or services to the Organization.

j) **Interested Party:** individual or group that has an interest in any Bradesco decisions or activities. For the purposes of the SGRSC, employees, apprentices, interns, third parties, customers, unions, regulatory and supervisory bodies are considered as interested parties.

k) **Child:** anyone under the age of 15, unless the minimum age for work or compulsory education is stipulated as being higher by local law, in which case the stipulated age at the top applies in that location.

l) **Collective Bargaining Agreement:** a contract specifying terms and conditions of work, negotiated between an organization (e.g.: employer) or group of employers and one or more workers' organizations.

m) **Value Chain:** complete sequence of activities or parties that provide or receive value in the form of products or services. Parties that provide value include suppliers, contractors, third party workers and others; valued parties include customers, advisors, and other users.

n) **Facilities:** departments, agencies and related companies of the Organization, responsible for the management and/or operationalization of a process, product or service.

o) **Corporate Social Responsibility Performance:** measurable results of management on social impacts.

p) **Interested Party Engagement:** activity carried out to create opportunities for dialogue between Bradesco and one or more of its interested parties, aiming to provide a solid and concrete basis for the Organization's decisions.

q) **Corporate Social Performance Team - EDSC:** team made up of employees from the Dependencies responsible for the management and/or operationalization of processes that integrate and/or interact with the SGRSC.

r) **SGRSC Governance:** system by which the Organization makes decisions and implements them in pursuit of its corporate social responsibility goals.

s) **Applicable Regulations:** internal and external rules and procedures that govern the activities of the Organization's products and services.

t) **Representative of the Social Responsibility Board:** a managerial-level employee to manage the performance of the SGRSC indicated by the Organization.

u) **Representative of the Occupational Safety and Health Board:** a managerial-level employee appointed by the Organization to ensure that the requirements of this Standard are met in aspects related to Occupational Safety and Health.

v) **Management Equity Conditions Representative:** a managerial-level employee appointed by the Organization to ensure that the requirements of this Standard are met in aspects related to equity conditions that impact the work environment.

5 Requirements of the Corporate Social Responsibility Management System

The requirements for Young Apprentice, Decent Work, Labor Relations, Diversity and Social Inclusion, Union Relations, Working Hours, Health, Safety and Welfare and Management System express the commitment to human rights, principles and fundamental rights in labor relations of Bradesco Organization, in line with the Bradesco Organization's Human Resources Management Policy, applicable to employees, apprentices, interns and third parties, as follows:

5.1 Essential Human Rights

The application of the Young Apprentices and Decent Work requirements considers the awareness of administrators, apprentices, employees, trainees and third parties, as well as the systematic monitoring of practices in labor relations, considering suppliers and services of social risk. The SGRSC Bradesco establishes a management model that monitors the social impacts generated by the activities of Bradesco Organization within the scope of essential human rights:

- Professional development support.
- Promotion of a productive and high quality work environment.

5.2 Fundamental Rights at Work

The application of the Labor Relations requirement covers practices of discrimination, inappropriate behavior and harassment in all its forms, including recruitment and selection, hiring, promotion and career processes; awareness and training programs for the internal public (employees, apprentices, interns and third parties). The SGRSC Bradesco establishes a management model that monitors the social impacts generated by the activities of the Bradesco Organization within the scope of work relations:

- Promotion of affirmative actions.

The application of the Diversity and Social Inclusion requirement covers processes aimed at adherence to applicable legislation, internal rules and regulations and best market practices. The SGRSC Bradesco establishes a management model that monitors the social impacts generated by the activities of the Bradesco Organization within the scope of diversity and social inclusion:

- Promotion and Enhancement of Diversity and Social Inclusion.

The SGRSC Bradesco establishes a management model that monitors the social impacts generated by the activities of the Bradesco Organization within the scope of Union Relations:

- Ensuring freedom of association and the right to collective bargaining.

In line with principle 4.7.8. Associations and Class Entities, from Bradesco Organization's Code of Ethical Conduct, the Human Resources Department has, in its structure, the Union Relations area, responsible for maintaining permanent dialogue and interaction with representatives of the union movement, nationwide, receiving manifestations, clarifying doubts and enabling a relationship characterized by easy access, agility and proactivity between the parties.

All employees are covered by Collective Bargaining Agreements and can participate in collective bargaining through assemblies. Information on union activities is posted on bulletin boards and in the *Jornal Sindical* (Union Newspaper), available at our entrances.

We provide, for the union campaign, infrastructure and guidance to managers regarding the neutrality of the Organization in relation to the decision of employees, facilitating the campaign and not imposing any obstacle to unionization.

The application of the Workday and Health, Safety and Welfare requirements consider standards of excellence of working conditions

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guaranteeing the occupational safety and health of its employees, apprentices, trainees and third parties and meeting legal and conventional requirements applicable to the work shift. The SGRSC Bradesco establishes a management model that monitors the social impacts generated by the activities of the Bradesco Organization within the mentioned scopes:

- Promotion of the quality of life and welfare of employees, apprentices, trainees and third parties.

6 Communication

The Organization establishes, implements and maintains procedures for:

- a) Internal communication between the various levels of the Organization.
- b) Receipt, documentation and responses to manifestations from interested parties, whenever required.
- c) Disclosure of information on Bradesco Organization's Human Resources Management Policy, actions and results related to the effectiveness of the SGRSC to its interested parties.

The means available for the dissemination of information on the performance of the SGRSC and main direction are:

- a) Internet (Bradesco Sustainability, Investor Relations and Bradesco Suppliers): intended for all audiences.
- b) Normative System: intended for employees.
- c) Corporate Portal > HR > Corporate Social Responsibility: intended for employees.
- d) Integrated Report: the Organization's annual progress report on Social and Environmental Responsibility, intended for all audiences.
- e) Book Bradesco - Economic and Financial Analysis Report: quarterly report for all audiences.

7 Complaints Management

Complaints involving matters related to Bradesco Organization's Human Resources Management Policy and the SGRSC must be made through the Centralized Reporting Channel, available to the entire Organization - administrators, employees, apprentices and trainees, as well as employees and other interested parties. All reports are maintained with the prerogative of anonymity, confidentiality and non-retaliation guaranteed.

7.1 Corporate Grievance Reporting Channel

- Electronic Form: Corporate Portal > Bradesco > [Channel for Complaints and Statements](#) and website Bradesco Investor Relations > Corporate Governance > [Whistleblowing Channels](#).
- Phone Number: 0800 776 4820, Monday to Friday, from 8 am to 6 pm, except weekends and national holidays.

Note: Social Responsibility Complaint Boxes are also available in the Cidade de Deus buildings.

7.2 Handling Flow of Complaints Received - Corporate Complaints Channel

1. The Corporate Channel receives and registers complaints in the system. A protocol number is generated and informed to the reporting person, so that he/she can follow the progress and the outcome of the occurrence.
2. It sends the DRH-Social Responsibility complaints related to moral and sexual harassment, inappropriate behavior, discrimination, misconduct, legal requirements, professional growth and occupational health and safety.
3. The Social Responsibility department records internal control complaints and surveys information on all aspects related to the manifestation, such as: recurrence, results of behavioral assessments, history of manifestations of the facility, among others, that may support further analysis.
4. In light of all the information collected, the complaints are presented to the Human Resources Working Group, composed of specialists in people management, who analyze all complaints and drive negotiations. The analysis involves the characteristics of the complaint, the knowledge of the group members regarding the Organization's managers, the results of the potential, competences and performance assessments, and instructions to reach the potential solving parties is provided. The solving party reports to the HR-Social Responsibility, within a predefined period, the actions taken to analyze the facts, the result of the assessment and the implemented solution, in addition to follow-up actions.
5. The outcome of the occurrence is recorded in the DRH-Social Responsibility controls and reported to DCCE, manager of the Centralized Reporting Channel for return to the reporting person.
6. On a quarterly basis, the DRH reports to the Integrity and Ethical Conduct Committee the consolidated information on the complaints received in the period.

In addition, the performance of the Corporate Social Responsibility Management System is periodically reported to the Sustainability and Diversity Executive Committee, including the results of the Internal and External Audits, carried out once a year.

8 Critical Supplier Management

The requirements of the Corporate Social Responsibility Management System must be met by the suppliers and are considered critical, for the purposes of the SGRSC, the resident service providers (allocated in Bradesco facilities) that, by nature, pose a risk to worker health and safety. These suppliers go through awareness and engagement and must be committed to the requirements of this Standard and to the activities defined by the SGRSC by signing the Commitment and Compliance Statement, when requested.

It is the responsibility of SGRSC managers and contract managers, in their areas of competence, to ensure compliance with such requirements by resident employees, civil works and frequent criticals, whose activity may bring social risks, in addition to occupational health and safety aspects.

9 Documentation and Records

The Managing Departments in the areas of competence of the SGRSC shall maintain appropriate records to demonstrate the Organization's compliance with the requirements of this Standard, control and maintain these records in an organized manner, in the form of a physical copy or electronic means. The Organization establishes, in the Procedures Manual of the Corporate Social Responsibility Management System, a documented procedure for identification, storage, protection, retrieval, retention time and disposal of records.

9.1 Documentation

The SGRSC documentation includes:

- a) The guidelines of the Bradesco Organization's Human Resources Management Policy
- b) Rules, procedures and documents necessary for the Organization to ensure the planning, operation and effective control of its processes.

9.2 Procedures Manual

The Procedures Manual for the Corporate Social Responsibility Management System is based on this Standard. The Management Offices Department, according to its area of activity, or through the EDSC, must determine:

- a) The scope of the SGRSC.
- b) The documented procedures established for, or reference to, the SGRSC.
- c) A description of the main elements of the SGRSC.

9.3 Measurement, Analysis and Improvement

The Organization establishes and maintains documented, through the SGRSC Procedures Manual, the procedures for the implementation and continuous monitoring to demonstrate its effectiveness, aiming to comply with the Bradesco Organization's Human Resources Management Policy and the requirements of this Standard, as per aforementioned responsibilities and authorities.

10 Internal Audit and External Audit

The Officers of the system's areas of competence must ensure that internal and external audits are carried out to verify that the SGRSC is in compliance with the planned provisions and is in compliance with the established rules and procedures.

For this purpose, evaluations will be carried out in two formats:

- a) Internal Audit: performed yearly on a document basis, with on-site checking when critical situations are identified, considering previous notes or deviations that occurred in the interval between audits, according to the SGRSC Procedures Manual.
- b) External Audit: performed yearly by an accredited and independent certification body, in accordance with the SGRSC Procedures Manual.

10.1 Noncompliance, Opportunity for Improvement and Corrective and Preventive Actions

When a Noncompliance is identified regarding this Standard and the Bradesco Organization's Human Resources Management Policy, corrective actions must be implemented. Based on these topics, it is possible to elaborate Preventive Actions when it is possible and feasible, allocating the appropriate resources, and if required, once an Opportunity for Improvement is identified, revisit the processes and seek appropriate and feasible improvements using Actions and classify them.

10.2 Performance Analysis by Management

The SGRSC Performance Analysis is a management tool that allows those responsible for the areas of competence, who are part of the Corporate Social Development Team - EDSC, to present to the Management the results regarding the objectives achieved and the adequacy needs for deliberation as to the effectiveness of the system and decision on the allocation of resources. Meetings can take place at two levels:

- 1st Level: Departmental Board.
- 2nd Level: Integrity and Ethical Conduct Committee

The meeting must take place at least once a year, after the external audit has been carried out.

10.3 SGRSC Critical Analysis

Critical Analysis is a management tool that allows the areas of competence and EDSC to assess the adequacy, relevance and continuous effectiveness of compliance with the Bradesco Organization's Human Resources Management Policy, procedures and performance of the Corporate Social Responsibility Management System, with the definition of objectives and goals, plans and actions. It must be carried out at least once a year, after an external audit. The analyzes must be recorded in minutes.

10.3.1 Inputs for Critical Analysis by the Persons Responsible for the Areas of Competence of the Management System and by the EDSC

The inputs for Critical Analysis must include information about:

- a) Results of the SGRSC audits: Internal and External Audits.
- b) Communication with interested parties, including suggestions and complaints per topic.
- c) Objectives and goals that contribute to the Organization's positioning and that affect the DJSI and ISE-Bovespa indexes, in the aspects that make up the SGRSC.
- d) Status of corrective and preventive actions.
- e) Monitoring of actions and decisions arising from previous analyses, by the Board or EDSC.
- f) Recommendations for improvement.

10.3.2 Critical Analysis Outputs

The outputs for Critical Analysis must include any decisions and actions related to resource needs and possible changes to this Standard (Corporate Social Responsibility Management System) of the Bradesco Organization, in the objectives, goals and other elements.

11 Application of Consequences

Consequences will be applied to actions related to violation of conduct in non-compliance with the Bradesco Organization's Corporate Consequences Policy and Consequences Standard, for example, but not limited to:

Unacceptable Conducts
Non-confidential handling of Complaints.
Use of bad faith, by the Organization's Management, Employees, Interns and Apprentices, when making Complaints.
Retaliation against Clients who make Complaints.
Practice of retaliation against the Organization's Administrators, Employees, Trainees and Apprentices who make complaints.
Retaliation against Employees, Suppliers or Outsourced Service Providers who make complaints.
Violate the Whistleblower anonymity without his/her authorization, legal requirement or judicial order.

11.1 Method for Applying Consequences/Disciplinary Measures

The Administration of the Facility in which the employee is assigned shall be responsible for applying disciplinary measures immediately, observing the provision in the item **Types of Consequences/Disciplinary Measures**, of the Bradesco Organization's Consequences Standard.