

# Commitment to human rights



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## **1 Commitment**

This document presents the Bradesco Organization's commitments regarding Human Rights regarding stakeholder relationship in accordance with the best international practices and regulations, especially **The United Nations (UN) Guiding Principles on Business and Human Rights** (2011).

Respect for Human Rights is mainly described at [Corporate Human Rights Policy](#) which covers the following scope:

1. Disseminate actions to foster respect for and protection of human rights in business and in the relationship with stakeholders;
2. Ensure compliance with laws, regulations and self-regulations applicable to our activities, as well as the proper integration of the guidelines of this Policy with the others existing in the Organization;
3. Promote identification and prevention actions aimed at avoiding negative impacts of our activities on human rights;
4. To minimize and repair the impacts directly caused by the Organization in case of disrespect of Human Rights.

In addition to the Corporate Human Rights Policy, Bradesco Organization relies on a robust regulatory framework consisting of policies and standards that support the protection of human rights, including:

- [Code of Ethical Conduct of Bradesco Organization](#);
- [Code of Ethical Conduct for the Purchasing Professionals](#);
- [Sectorial Code of Ethical Conduct for Bradesco Organization's Financial and Capital Market Professionals](#);
- [Sectorial Code of Ethical Conduct of Bradseg Participações S.A., its Affiliates and Subsidiaries](#);
- [Bradesco Social and Environmental Responsibility in the Supply Chain Standard](#);
- [PRSAC - Social, Environmental and Climate Responsibility Standard](#);
- [Social, Environmental and Climate Risk Standard](#).

- [Corporate Social Responsibility Management System Standard;](#)
- [Know Your Client Policy;](#)
- [Know Your Partner Policy;](#)
- [Corporate Sustainability Policy;](#)
- [Purchasing Policy of Bradesco Organization](#)
- [Diversity, Equity and Inclusion Policy of Bradesco Organization's;](#)
- [Human Resources Management Policy;](#)
- [Institutional Policy of Relationship with Customers and Users;](#)
- [Bradesco Integrity Program Standard;](#)
- [Corporate Competition Policy;](#)
- [Competitive Compliance Program Standard;](#)

### **1.1 Voluntary Commitments**

We have also joined a number of initiatives of global relevance that address joint efforts to tackle the main challenges for sustainable development. With this, we strengthen our strategy, articulate learning and solutions and contribute to the joint and multisectoral progress of companies in Brazil.

It is worth highlighting the commitments that enhance our commitment to the Human Rights agenda:



Learn more about the Bradesco Organization's voluntary commitments in [Governance and Sustainability Strategy | Bradesco Sustainability \(banco.bradesco\)](#)

## **2 Scope and expectations regarding the responsibilities of Employees, Suppliers, Clients and other interested parties**

### **2.1. Scope**

The guidelines in this document reflect the Standard Framework and the Corporate Human Rights Policy, and are applicable to all operations and businesses of the Bradesco Organization, including our own operations, as well as vendors and business partners.

The scope of the Commitment to Human Rights covers the relationships with employees, clients, suppliers and local communities is described in next sections.

### **2.1.1. Employee Relations**

Bradesco Organization's employees are recognized as the holders of rights primarily involved in operating activities, and their labor and human rights are respected, especially regarding the conditions of the work environment and performance of daily activities.

Labor relations are in line the following guidelines:

- i. Promote respect for human rights, their diversity, dignity and equity, reserving individuality and privacy, not admitting the practice of discriminatory acts of any nature (race, color, gender, religion, politics, origin, age, orientation sexual and gender identity, social and economic status, marital status, physical condition), and moral or sexual harassment, in the workplace and in all relationships, with the internal and external audience;
- ii. Encouraging good relations among all the Organization's professionals, maintaining a safe and healthy work environment by complying with the guidelines set out in the Internal Occupational Health and Safety Regulations (ergonomics, lighting, ventilation and favorable working conditions);
- iii. Promote actions aimed at gender equity and female empowerment;
- iv. Contribute to improving the quality of life of employees, offering conditions for a balance between work, health and family;
- v. Ensure equal opportunities for development and internal career development for all employees;
- vi. Practice equity in all of our relationships, irrespective of race, color, sex, religion, politics, origin, age group, sexual orientation and gender identity, social and economic status, marital status and physical condition;
- vii. Ensure the right to free union association and collective bargaining, recognizing the important role of legally constituted associations and class entities, through their initiatives and practices;
- viii. Fair and favorable working conditions (adequate wages and working hours, benefits, paid rest and social protection);
- ix. Right to the offering of equal opportunities for career development and compensation irrespective of gender, religion, race/ethnicity, age group, physical condition; and

- x. Fighting slave-like labor and child labor and the sexual exploitation of children, adolescents, and women in the work environment and in all relations, with both the internal and external audience.

### **2.1.2. Client Relations**

Bradesco Organization bases its commercial relations on respect for the human rights of clients in its interactions, particularly relating to:

- i. Fair and equitable business relationship: when offering products and services, Bradesco Organization provides guidance to its clients in choosing the best financial solutions suitable for their needs, capacities and financial profile, considering the indebtedness and level of vulnerability of each client as a risk that must be mitigated, as well as offering financial education solutions, providing information, actions and services that are useful and relevant to their financial life; financial inclusion, through effective access to financial services according to their needs; participation with open channels for debate and capturing opinions; and consumer protection, through a secure and reliable business environment with relationships based on ethics and transparency;
- ii. Prevention of abuse and discrimination: in its branches and facilities, Bradesco aims to prevent any form of discrimination and harassment, whether based on criteria of gender, color/race, age group, religion, sexual orientation and people with physical disability;
- iii. Prevention of sexual exploitation of children, adolescents and women;
- iv. Information Leakage Prevention: We have an information and cybersecurity management structure that aims to preserve the integrity, availability, and confidentiality of the Organization's and its clients' data, mitigating financial losses and image risk;
- v. The Organization's risk management considers risks related to information security and cybersecurity, and controls include procedures, processes,

organizational structures, policies, standards and IT solutions, which aim to protect information; and

- vi. The Corporate Policy on Information Security and Cybersecurity guides all Bradesco Employees, Non-Employees and Executives on the proper use of internal systems and information handling, keeping as main focus the protection of its clients' data and the Organization's information assets. The topic is managed by the Corporate Security Department, with the involvement of several areas and acting on different fronts.

Business relations between Bradesco Organization and its clients are also guided by CMN Resolution No. 4.949 of the Central Bank of Brazil and reflected in the [Institutional Policy of Relationship with Customers and Users](#).

### **2.1.3. Relations with Local Communities**

Bradesco Organization's Commitment to Human Rights recognizes that, in credit transactions, including financing for industrial and infrastructure projects, as well as investment operations, adverse social and environmental impacts may occur on local communities within the areas of influence of enterprises. These risks are considered indirect, in credit transactions, and investments, since the direct responsibility for mitigating such risks and impacts lies with the borrowers and investees.

In this sense, mechanisms and controls existing in Bradesco Organization's regulatory framework guide its clients and investees to adopt, at least, the following mitigation measures:

- Identification, assessment, control, mitigation and offsetting of impacts on local communities, especially those that may pose human rights risks;
- Offer of communication channels for the expression of doubts, complaints and reports;
- Adoption of practices aimed at maintaining the health and safety of impacted local communities; and
- Right to remedy in case of violation of human rights.

The Bradesco Organization has social, environmental and climate risk management mechanisms so that clients and financed projects comply with legal requirements.



## **2.2. Expectations regarding the responsibilities of Employees, Suppliers, Clients and other stakeholders**

The adoption of the UN Guiding Principles on Business and Human Rights and other voluntary commitments to which Bradesco Organization adheres implies the establishment of expectations related to the guarantee of human rights among its stakeholders. These expectations are defined in the following sections.

### **2.2.1. Expectations relating to Employees**

Bradesco Organization employees shall be aware of the standards framework, the guidelines of the Corporate Human Rights Policy and other mechanisms aimed at the protection of human rights, in the coexistence and maintenance of a safe work environment, and in business activities, ensuring that established mechanisms are enforced.

Due diligence is carried out through processes set forth in the Corporate Social Responsibility Management System (SGRSC) aiming at continuously improve the quality of relationships and conditions in the work environment for employees, associates and other stakeholders, based on the Code of Ethical Conduct and the Policy of Human Resources Management, in addition to other policies, internal rules and legislation applicable to our activities. SGRSC requirements are in line with Human Rights, Children's Rights and Fundamental Labor Rights.

Suppliers considered critical (resident service providers that, by their nature, pose a risk to the health and safety of workers), for the purposes of SGRSC, agree to these requirements by signing the Statement of Compliance and Commitment.

Our commitment is to act with the principles of equity, inclusion and respect, in addition to the concept of justice based on equal rights, preservation of individuality and privacy, not accepting the practice of any discriminatory acts and moral and sexual harassment.

### **2.2.2. Expectations regarding Suppliers, Clients, Partners and other related parties**

#### **➤ Suppliers:**

Vendors must be in compliance with the provisions of Bradesco Organization's Code of Ethical Conduct, Sectorial Code of Ethical Conduct for Bradesco Organization's Purchasing

Professional, the Corporate Policies on Information Security, Anticorruption, Antitrust and Human Rights and Bradesco's Integrity and Competition Compliance Programs Standards, as well as any and all Policies, Codes and Standards available at [www.bradescofornecedores.com.br](http://www.bradescofornecedores.com.br).

Vendors undertake to enforce the directed regulatory framework, including their employees, agents and subcontractors' employees and agents, as applicable.

It should be noted that agreements with vendors provide for binding clauses with the protection of human rights, especially with regards to:

- Fighting slave-like labor, child labor, and sexual exploitation;
- Preventing and combating acts of sexual and moral harassment;
- Respect for labor rights including fair and favorable working conditions; and
- No use of discrimination practices, which limit the access to the employment relationship or maintenance thereof, such as, but not limited to, due to: gender, origin, ethnicity, color, physical condition, religion, marital status, age group, family situation or pregnancy.

➤ **Clients:**

Credit assessment for clients follows scope and criteria that consider the principle of relevance and proportionality, when granting and renewing credit, with an individualized socio-environmental risk assessment methodology for clients operating in sensitive sectors.

These assessments, in addition to environmental criteria, verify practices related to Human Rights, especially with regards to:

- Fighting slave-like labor, child labor, and sexual exploitation;
- Fair and favorable working conditions;
- Prevention of discrimination and harassment;
- Occupational health and safety; and
- Health and safety of local communities.

This management is supported by our Social, Environmental and Climate Risk Standard, which, in turn, is in compliance with the Sustainability, Social Responsibility, Environmental and Climate Responsibility Policies (PRSAC).

Learn more about the social, environmental and climate risk strategy: [ESG Report](#) - p. 34 to 37.

### **3 Implementation**

This section describes the procedures for implementing the Commitment to Human Rights of the Bradesco Organization<sup>1</sup>, namely:

- Risk identification and prioritization;
- Communication Channels (Whistleblower Mechanisms); and
- Due Diligence: monitoring of own operations, suppliers, business partners and client transactions.

1 - This Commitment covers the analysis and correlation on how the entire regulatory framework of Bradesco Organization addresses the issue of Human Rights, both from the point of view of operational/business activities, and in relation to expectations with related parties and business partners.

### 3.1. Risk identification and prioritization

We have a series of processes and procedures for identifying, assessing, monitoring and repairing and/or mitigating risks and impacts on human rights.

The human rights risk matrix is reviewed biannually, with the goal of mapping potential risks to our business and operations.

In this process, Bradesco's operations and businesses are considered, as well as the holders of rights (e.g. direct and indirect employees, clients, local communities, business partners, etc.) in compliance with the human rights internationally recognized in the conventions adhered to by Bradesco Organization.

In 2022, the process of identifying and assessing human rights risks started to consider external risks posed by the Brazilian context, in their interrelation with operational aspects of Bradesco Organization, in addition to the risks internally identified by the controls and management mechanisms for social and environmental risk.

The risks were assessed according to the criteria defined by the UN Principles on Business and Human Rights: **Severity** and **Probability**, and then associated with human rights at risk of being impacted and the holders of such rights. The following references were used in updating Bradesco Organization's Human Rights Risk Matrix<sup>2</sup> in 2022:

2 The preparation of the Risk Matrix was supported and verified by the ERM - Environmental Resources Management. The next review is scheduled for the second half of 2024.

- Guiding Principles on Business and Human Rights - United Nations (2011);
- OECD Guidelines for Multinational Enterprises - Organization for Economic Co-operation and Development (2011);
- Guiding Principles on Business and Human Rights; Reporting Structure - United Nations (2015);
- Doing Business with Respect for Human Rights: a guidance tool for companies - Shift, Global Compact and Oxfam (2016);
- *Human Rights Assessment - Global Reporting Initiative* (2016); and
- OECD Guide to Due Diligence for Responsible Business Conduct – Organization for Economic Co-operation and Development (2018); and
- *Human Rights Due Diligence and COVID-19: Rapid self-assessment for Business - United Nations* (2020).

Through this process, 8 priority risks were identified that represent the main human rights threats in the latest update of the [Human Rights Risk Matrix<sup>2</sup>](#), all with the appropriate prevention and remediation measures applicable. These risks are disclosed in Bradesco Organization's [Human Rights Risk Matrix<sup>2</sup>](#) (2022).

2 The preparation of the Risk Matrix was supported and verified by the ERM - Environmental Resources Management. The next review is scheduled for the second half of 2024.

The 8 most significant risks identified through this update were:

Relevant issues (external and internal risks)	Rights at risk of impact	Holders of rights
RIGHTS OF INDIGENOUS PEOPLES AND TRADITIONAL COMMUNITIES	<ul style="list-style-type: none"> <li>Right to self-determination</li> </ul>	<ul style="list-style-type: none"> <li>Indigenous peoples and traditional communities</li> </ul>
COVID-19	<ul style="list-style-type: none"> <li>Right to health;</li> <li>Right to life</li> </ul>	<ul style="list-style-type: none"> <li>Direct employees;</li> <li>Indirect employees</li> </ul>
CLIMATE CHANGE: SOCIAL AND ECONOMIC IMPACTS	<ul style="list-style-type: none"> <li>Right to health</li> <li>Right to life</li> </ul>	<ul style="list-style-type: none"> <li>Communities impacted by sectors that exacerbate climate change</li> </ul>
CORRUPTION: SOCIAL AND ECONOMIC IMPACTS	<ul style="list-style-type: none"> <li>Right to adequate standards of living</li> </ul>	<ul style="list-style-type: none"> <li>Civil Society</li> </ul>
DATA PROTECTION AND INFORMATION CONFIDENTIALITY	<ul style="list-style-type: none"> <li>Right to privacy</li> </ul>	<ul style="list-style-type: none"> <li>Clients;</li> <li>Direct employees;</li> <li>indirect employees;</li> <li>Related parties.</li> </ul>
HEALTH AND SAFETY OF IMPACTED COMMUNITIES	<ul style="list-style-type: none"> <li>Right to life;</li> <li>Right to health</li> </ul>	<ul style="list-style-type: none"> <li>Local communities in funded projects</li> </ul>
FORCED LABOR	<ul style="list-style-type: none"> <li>Right not to be held in slavery or servitude, or made to do forced labour</li> </ul>	<ul style="list-style-type: none"> <li>Workers on funded projects and activities</li> </ul>
CHILD LABOR	<ul style="list-style-type: none"> <li>Child protection right</li> </ul>	<ul style="list-style-type: none"> <li>Workers on funded projects</li> </ul>

### 3.2. Corporate Whistleblower Channels (Complaints and Reporting Mechanisms)

Bradesco Organization's Code of Ethical Conduct and Human Resources Management Policy, establish specific mechanisms for receiving communication of human rights issues through the Corporate Whistleblowing Channel set out in websites: [Institutional](#), [Bradesco Investor Relations](#), [Corporate Portal](#) (internal portal aimed at employees, trainees, apprentices and

collaborators), or by phone number 0800 776 4820 (open from Monday to Friday, from 8 a.m. to 6 p.m., except on weekends and national holidays), open to all interested parties to register complaints.

Bradesco Organization also reports to its stakeholders its performance in the management of human rights issues in its [Integrated Report](#), published annually.

The Organization's Corporate Whistleblower Channel is available to management, employees, apprentices, interns, service providers and other stakeholders, with the prerogative of anonymity, secrecy and confidentiality. All complaints received through the Corporate Whistleblower Channel are forwarded to the areas responsible for treatment according to the nature of each issue.

Reports on moral and sexual harassment, discrimination, inappropriate behavior, misconduct, occupational health and safety, labor requirements and professional development are submitted to HRD-Social Responsibility for analysis, treatment and the required preventive and corrective actions, who performs the assessment while maintaining confidentiality, independence, transparency, integrity and ethics, to ensure proper treatment, from receipt to completion.

#### **Corporate Whistleblower Channel:**

- **Electronic Form:**

*Website:* [Institutional/Service/Report](#);

*Website* [IR Bradesco/Corporate Governance/Corporate Whistleblower Channel](#); and

*Website:* [Corporate Portal/Bradesco/Whistleblower Channel](#).

- **Via telephone:**

**0800 776 4820**, (Monday to Friday, from 8 am to 6 pm, except for weekends and national holidays).

- **Whistleblower Boxes:**

- **Cidade de Deus:** [located in the buildings of Cidade de Deus](#).

### **3.3. Due Diligence: credit and financing transactions, supplier monitoring, other**

## **transactions**

Monitoring of human rights risks and impacts on transactions, with clients, suppliers and business partners, is included in the scope of action of Bradesco Organization's social and environmental risk management.

### **3.3.1. Due Diligence in Credit and Financing Transactions**

Credit and project financing transactions are assessed and monitored by the Integrated Risk Control Department (DCIR), based on the Social, Environmental and Climate (SAC) Risk Standard to identify human rights risks and impacts financed by Bradesco Organization.

In credit transactions, social, environmental and climate risk management covers the assessment of clients operating in sectors with a potential social and environmental impact and with relevant credit exposure, while the assessment of financed projects is defined on the basis of the economic sector and the amount of funding.

When granting credit to clients within the scope described above, the human rights assessment process is conducted through the application and assessment of a social and environmental questionnaire, as well as other social and environmental documents, which addresses issues such as the occurrence of child labor and slave-like labor, impacts on traditional communities, good social practices and procedures that ensure the health and safety of workers.

For project financing transactions, a due diligence process takes place, which includes the application of a sector checklist. This process allows human rights issues to be assessed through the analysis of licenses and social and environmental studies, addressing issues such as the relocation of local communities, the occurrence of child labor and slave-like labor, and impacts on traditional communities and historical and cultural heritage. Subsequently, the need to include specific clauses in the agreement or any conditions precedent to contracting is assessed due to the risks identified, including those linked to the protection of the human rights of communities and workers, as well as monitoring the project throughout the agreement, when necessary.

In addition, the Organization has been a signatory to the Equator Principles since 2004 and works to ensure that financed projects are implemented on a socially responsible basis and



reflect the best environmental, social and climate management practices set out in the International Finance Corporation's (IFC) Performance Standards and the World Bank's Health, Safety and Environment Guidelines. These standards include several themes, such as: Employment and Working Conditions; Community Health and Safety; Land Acquisition and Involuntary Resettlement; Indian people; and Cultural Heritage.

In cases where the Organization approves funding for projects that fall under the Equator Principles, critical sectors or departments with relevant impacts, and these are submitted for periodic monitoring of the specific social and environmental clauses established in the agreement.

The monitoring process includes analysis of social and environmental documents, media research and monitoring, consultation of public databases and, where applicable, hiring independent consultants, field visits and conferences with the client. If, during monitoring, it is found that the client has not fully complied with the social and environmental contractual clauses, including those related to the protection of human rights of communities and workers, the Organization can stay future release of funds or even proceed with the early settlement of the agreement.

In addition, the periodic monitoring of social and environmental performance related to clients listed in public databases, such as the Employers Register who have submitted workers to slave-like conditions, list of embargoes from the Brazilian Institute for the Environment and Renewable Natural Resources (IBAMA) and Chico Mendes Institute for Conservation of Biodiversity (ICMbio) and public registers of contaminated areas, and provide support to areas involved in decision-making.

As a complement to credit transactions and project financing, the Organization has measures in place to prevent the opening of accounts and the contracting of credit transactions with individuals or companies proven to be involved in the use of slave-like labor, the use of child labor or the criminal exploitation of prostitution.

### **3.3.2. Due Diligence in the Supply Chain**

To become a Bradesco supplier, it is necessary to go through the approval process, under the responsibility of the Purchasing department. This process is performed by the Supplier Management, which assesses the companies' compliance from the registering, commercial, economic, financial and social and environmental viewpoints. The social and environmental issues analyzed cover labor practices through public certificates, prohibition of slave-like or child labor, environmental risks and negative media.

After analyzing this information, the supplier is approved and then adhere to our Code of Conduct and other policies and standards. Our agreements also include clauses on forced and child labor, anti-corruption and social and environmental aspects.

Suppliers are duly informed about our Code of Ethical Conduct, Policies and Standards, as well as our Bradesco Integrity Program, from the initial stages of the process, prior to its approval, by completing a questionnaire. Furthermore, during self-registration in the system used, the company is also requested to adhere to such requirements. At the end of approval, in addition to formalizing the process, suppliers are required to confirm its adherence to the Code, policies and standards established.

In addition to the purpose of economically promoting the national territory, where most of our important operating units and the majority of our suppliers are located, the goal for the proportion of spending with local suppliers is that it should be made in most or 100% of the Brazilian territory.

Suppliers under approval and suppliers with agreements in force that present entries called Prohibitive RSA (082) and/or Restrictive RSA (081) (linked to slave-like and/or child labor practices, sexual exploitation), and/or Environmental Infraction (233) and/or Contaminated Areas (311), must undergo a social and environmental risk analysis.

### **Monitor and Develop**

Aiming to mitigate risks, Supplier Management area monitors periodically the base of registered companies. If any impeding restriction is identified, the supplier is blocked for future agreements. Research includes restrictions such as slave-like labor and child labor, embargoed and contaminated areas.

We also work with monitoring processes and social and environmental development. "Most Sustainable Supplier", is Bradesco's Social and Environmental Responsibility program in the Supply Chain, which consists of carrying out social and environmental audits based on the management of Environmental, Social and Governance aspects.

In the Social Responsibility pillar, we address the topics of Ethics, Compliance with Labor Laws, human rights (respect for the right to free association and unionization; right to non-discrimination and equal opportunities - prevention of discrimination by gender, color /race, age, sexual orientation and people with disabilities, offering equal opportunities for career development and compensation; prevention of all forms of harassment; combating forced and child labor), supply chain management, anti-corruption, antitrust, diversity, information security and business continuity.

We address the topic of Health and Safety, which also covers governance issues such as policies, standards and training. Other items analyzed include: labor assessments, work accidents, Emergency Response Plan (PAE), documentation (AVCB, NR 23 - Fire Protection, NR 9 - Environmental Risk Prevention Program, NR 7 - Medical Control Program for Occupational Health, NR 4 - Specialized services in safety engineering and occupational medicine, NR 5 - Internal Accident Prevention Commission, etc.), creation of an emergency brigade, emergency drills, among others.

Another very relevant point addressed is the implementation by the supplier of actions or programs to promote employee well-being, contributing to the healthy balance between personal and professional life and to mental health (pilates, gym, psychologists, events, etc.), as well as encouraging the supplier to have an appropriate whistleblowing channel available to in-company personnel and stakeholders.

One of the categories audited is suppliers that provide Call Center services, as this is a critical category from a social point of view, so we included specific questions for this segment in the health and safety pillar.

After the audits, the supplier is required to prepare an action plan for identified findings and improvement opportunities. The report is assessed and monitored by the auditor, who is also available to assist and clarify the supplier's doubts.

We audited 100% of critical suppliers on social and environmental issues in 2023, involving 90 companies operating in civil works, printing of materials, clothing, wood production chain, visual communication, infrastructure equipment manufacturing, card manufacturing, information technology equipment manufacturing, transport services, surveillance, branch back-up, call center and aircraft and vehicle maintenance. In addition to the critical categories, at least one supplier from each category is also audited.

Additionally, we also have a social and environmental supplier assessment process, carried out by the Purchasing area and the Integrated Risk Control Department. This process is applicable to suppliers considered critical under the social and environmental aspect. The rating is issued through periodic monitoring of infringements, assessments and news involving the partner or sector to which it belongs, among other items.

### **3.3.3. Monitoring of Investments and Joint Ventures**

As a signatory to the Principles for Responsible Investment (PRI), BRAM (Bradesco Asset Management) has a responsible investment policy, which considers, among other aspects: situations of corruption and conflicts of interest, compliance with legal requirements, transparency and accountability, respect for human and labor rights and impacts on the environment and climate change. Thus, it uses methodologies to analyze the risks, opportunities and potential impacts arising from ESG aspects on the performance of its assets.

Generally, the banking correspondent agreements linked to the contracts of the Bradescard and Bradesco S.A. joint ventures related to the sale of credit cards, loans and receipt of invoices, have specific clauses to combat child and slave-like work and uphold the environment, among others, written in accordance with the best practices suggested by the various control and legal departments of the Bradesco Organization.

It is worth mentioning that although there is autonomy of action between the parties within their responsibilities in the Joint Ventures, where the partners' employees are usually submitted to a retailer's own code of ethics, the Organization's own code of ethics is also distributed for knowledge and improvement of the work quality and conditions, as well as social and environmental impact.

Periodic visits are carried out as a monitoring mechanism and, if any misconduct is seen, the themes and any problems are escalated to the highest partnership management committees for the appropriate measures.

#### **4 Remedy**

Human rights issues shall be investigated on a prompt, impartial and confidential basis. Reports on human rights violations are supported by the Code of Ethical Conduct, which also ensures the **right to remediation** of possible violations.

Concerning business activities, the Organization works directly with clients, implementing remediation actions in the event human rights violations are identified, even if indirectly linked to the adverse impact.

#### **5 Commitments to supporting the positive accomplishment of Human Rights**

According to the Global Compact, “SDGs seek to ensure human rights, end poverty, fight inequality and injustice, achieve gender equality and the empowerment of women and girls, act against climate change, as well as address other major challenges of our times<sup>1</sup>”.

In this sense, in addition to mitigating the risks and impacts of direct and indirect human rights in its value chain, Bradesco Organization also focuses on actions aimed at the positive accomplishment of human rights through its Sustainability Strategy, which is in line with the Agenda 2030 of the Sustainable Development Goals (SDGs).

In 2019, we reviewed our Sustainability Strategy considering the main global challenges and trends, the perception of stakeholders, the Organization's business goals, and the main national and international sustainable development agendas - especially the Sustainable Development Goals (SDG) of the United Nations.

1- UN Global Compact – Rede Brasil

SDGs prioritized by Bradesco Organization in correlation with the goals of the Sustainability Strategy are shown in the following figure:



Find out more about the Bradesco Organization's specific contributions to the SDGs, including human rights:

- [ESG Report](#) and [ESG indicator spreadsheet](#).