

Commitment to human rights



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1 Commitment

This document presents the commitments and mechanisms for implementation and monitoring of the Bradesco Organization in relation to the respect and protection of human rights in accordance with the best practices and international regulations, especially **The United Nations (UN) Guiding Principles on Business and Human Rights** (2011).

The respect for Human Rights permeates our policies and is articulated with the best sustainability practices. The Bradesco Organization's formal Commitment to the protection of internationally recognized human rights was defined in the [Corporate Human Rights Policy](#)¹, which includes the following scope:

1. Disseminate actions to promote respect and protection of human rights in business and in relationships 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 others existing in the Organization;
3. Promote identification and prevention actions in order to prevent negative impacts of our activities on human rights;
4. Avoid and, when not possible, repair the impacts caused directly by the Organization in case of disrespect for human rights.

In addition to the Corporate Human Rights Policy, Bradesco Organization has a robust normative framework consisting of policies and standards that uphold human rights, among them:

- Bradesco Organization's Code of Ethical Conduct

[https://www.bradescori.com.br/wp-](https://www.bradescori.com.br/wp-content/uploads/sites/541/2022/12/Codigo_de_Conduta_Etica_Organizacao_Bradesco_Maio2022.pdf)

[content/uploads/sites/541/2022/12/Codigo_de_Conduta_Etica_Organizacao_Bradesco_Maio2022.pdf](https://www.bradescori.com.br/wp-content/uploads/sites/541/2022/12/Codigo_de_Conduta_Etica_Organizacao_Bradesco_Maio2022.pdf)

- Code of Ethical Conduct for professionals of the Procurement Department;
http://www.bradeskori.com.br/wp-content/uploads/sites/541/2022/03/96_1_Codigo_Setorial_Compras_24.2.2022-1.pdf
- Bradesco Organization's Sectoral Code of Ethical Conduct for Financial and Capital Market Professionals;
https://www.bradeskori.com.br/wp-content/uploads/sites/541/2021/08/Codigo_de_Conduta_Etica_Setorial_Mercado_Financeiro_e_de_Capitais_19042021.pdf
- Bradseg Participações S.A. Sectoral Code of Ethical Conduct, its associated and controlled companies
<https://www.bradeskori.com.br/wp-content/uploads/sites/541/2022/02/Codigo-de-Conduta-Etica-Setorial-Versao-Final.pdf>
- Bradesco Standard for Social and Environmental Responsibility in the Supply Chain
<https://www.bradescofornecedores.com.br/portal/PDF/fornecedores/norma-PBRSA-CS.pdf>
- PRSAC – Social, Environmental and Climate Responsibility Standard;
<https://api.mziq.com/mzfilemanager/v2/d/80f2e993-0a30-421a-9470-a4d5c8ad5e9f/b39dad3b-d60e-2d53-7430-fd4f920d5402?origin=1>
- Social, Environmental and Climate Risk Standard.
https://banco.bradesco/assets/classic/pdf/sustentabilidade/2020_Bradesco_RiscoSocioambiental_Norma.pdf
- Standard for the Corporate Social Responsibility Management System;
<https://api.mziq.com/mzfilemanager/v2/d/80f2e993-0a30-421a-9470-a4d5c8ad5e9f/9d0404a4-2dbf-8118-d1e7-47dcd0638c40?origin=1>

- Know Your Customer Policy;

<https://api.mziq.com/mzfilemanager/v2/d/80f2e993-0a30-421a-9470-a4d5c8ad5e9f/b584b499-4e96-404d-a59b-2196a701fd61?origin=1>

- Know Your Partner Policy;

<https://api.mziq.com/mzfilemanager/v2/d/80f2e993-0a30-421a-9470-a4d5c8ad5e9f/94c51eaf-133a-4e5b-90cb-90e268400f61?origin=1>

- Corporate Sustainability Policy;

<https://api.mziq.com/mzfilemanager/v2/d/80f2e993-0a30-421a-9470-a4d5c8ad5e9f/0f6ea90d-687f-485e-b978-0e32a800f161?origin=1>

- Procurement Policy

<https://www.bradescofornecedores.com.br/portal/PDF/fornecedores/conheca-portal-fornecedores/politica-compras-organizacao-bradesco.pdf>

- Bradesco Organization's Diversity and Inclusion Policy;

<https://api.mziq.com/mzfilemanager/v2/d/80f2e993-0a30-421a-9470-a4d5c8ad5e9f/f36d8b96-87fd-4531-acc6-3fd3755c1609?origin=1>

- Human Resources Management Policy;

<https://api.mziq.com/mzfilemanager/v2/d/80f2e993-0a30-421a-9470-a4d5c8ad5e9f/ab9e8c08-d054-5dba-fc5d-03fcd615812e?origin=1>

Institutional Standard for Relationship with Customers and Users

<https://www.bradescofornecedores.com.br/portal/PDF/fornecedores/norma-institucional-de-relacionamento-com-clientes-e-usuarios.pdf>

Institutional Policy for Relationship with Customers

<https://api.mziq.com/mzfilemanager/v2/d/80f2e993-0a30-421a-9470-a4d5c8ad5e9f/704fe27e-a696-4c0b-b9a7-fdbaaaf6a9f5?origin=1>

- Bradesco Integrity Program Standard;
https://www.bradescori.com.br/wp-content/uploads/sites/541/2022/08/Programa-de-Integridade-Bradesco_v6_PORT.pdf
- Corporate Competition Policy;
[Policies and Standards - Bradesco RI](#)
- Competitive Compliance Program Standard;
[e40b194e-b82f-6fa8-8ec4-8f353a8e3c68 \(mziq.com\)](#)

In order to enhance our commitment to the Human Rights agenda, in addition to internal management and governance mechanisms, we adhere to voluntary commitments aligned with practices that uphold human rights. **We highlight:**

The box contains the following elements:

- Global Compact**: Logo of the UN Global Compact, featuring a globe with the text "UN GLOBAL COMPACT" above it.
- Equator Principles**: Logo of the Equator Principles, featuring a globe with the text "EQUATOR PRINCIPLES" to its right.
- Sustainable Development Goals (SDG)**: Logo of the Sustainable Development Goals, featuring a colorful wheel with the text "SUSTAINABLE DEVELOPMENT GOALS" above it.
- Women's Empowerment Principles (WEPs) and HeforShe**: A composite logo featuring the text "EMPOWERMENT PRINCIPLES" vertically, "WOMEN'S" vertically, "EQUALITY MEANS BUSINESS" horizontally, "UN WOMEN" and "UNITED NATIONS GLOBAL COMPACT" in yellow boxes, and the "HeForShe" logo (a stylized cross) with the text "HeForShe UN Women Solidarity Movement for Gender Equality" below it.
- Business coalition to end violence against women and girls**: Logo for "coalizão empresarial pelo fim da violência contra mulheres e meninas" (business coalition to end violence against women and girls).
- Among others.**: Text at the bottom left of the box.

Find out more about Bradesco Organization's voluntary commitments in [Governance and sustainability strategy | Bradesco Sustainability \(banco.bradesco\)](#)

2 Scope and expectations regarding the responsibilities of Employees, Vendors, Customers and other related parties

2.1. Scope

Both the Corporate Human Rights Policy and the mechanisms listed in the Human Rights Commitment are applicable to all operations and businesses of the Bradesco Organization. Such regulations cover the requirements for our own operations (employees, direct activities, products or services), as well as vendors and business partners.

The Bradesco Organization acknowledges its responsibility to protect human rights in all its operations, reinforcing its role as a major financial services provider and employer of a wide range of employees.

The scope of the Human Rights Commitment includes the relationship with employees, customers, vendors and local communities, as described in the next sections.

2.1.1. Employee Relations

Bradesco Organization employees are recognized as the holders of rights primarily involved in operational activities, and have their labor and human rights respected, especially with regards to the conditions of the work environment and the performance of daily activities.

Labor relations are according to 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, sexual orientation and gender identity, social and economic status, marital status, physical condition), and psychological or sexual harassment in the workplace and in all relationships, with internal and external stakeholders.
- ii. Encourage good relationships among all the Organization's professionals, maintain 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 equality and female empowerment;
- iv. Contribute to the improvement of employees' quality of life, providing conditions for balance between work, health and family;
- v. Ensure equal opportunities for development and internal career advancement for all employees;
- vi. Practice equity in all our relationships, irrespective of race, color, sex, religion, politics, origin, age, sexual orientation and gender identity, social and economic situation, marital status and physical condition;
- vii. Ensure the right to free union association and collective bargaining, recognizing the key role of legally constituted associations and class entities, through their initiatives and practices;
- viii. Fair and favorable working conditions (proper wages and working hours, benefits, paid rest and social protection);
- ix. Right to offering equal opportunities for career development and remuneration irrespective of gender, religion, race/ethnicity, age, physical condition; and
- x. Combating child and slave labor and sexual exploitation of children, adolescents and women in the work environment and in all relationships, with the internal and external public.

2.1.2. Customer Relations

The Bradesco Organization bases its commercial relations on respect towards customers' human rights in their interactions, especially with regards to:

- i. Fair and equitable commercial treatment: when offering products and services, the Bradesco Organization provides guidance to its customers in choosing the best financial solutions, compatible with their needs and capabilities, considering indebtedness and vulnerability levels of each customer as a risk that must be

mitigated, in addition to offering financial education solutions with useful and relevant information and actions for your financial life; financial inclusion, through effective access to financial services; participation with open channels for debate and gathering of opinions; and economic protection, through a relationship based on ethics and transparency;

- ii. Preventing abuse and discrimination: in addition, Bradesco aims to prevent the situation of any form of discrimination and harassment in its branches and premises, whether based on gender, color/race, age, religion, sexual orientation and people with physical disabilities;
- iii. Prevention of sexual exploitation of children, adolescents and women;
- iv. Prevention of Information Leakage: For this, we have an information and cybersecurity management structure that aims to safeguard the Institution's and its customers' data and preserve information integrity, availability and confidentiality, mitigating financial losses and image risk.
- v. The Organization's risk management considers risks related to information security and cybersecurity, when controls include procedures, processes, organizational structures, policies, standards and IT solutions with the objective of safeguarding information; and
- vi. The Corporate Information and Cyber Security Policy guides all Bradesco Employees and Executives on the proper use of internal systems and information handling, focusing on safeguarding its customers' data and the Organization's information assets. The topic is managed by the Corporate Security Department, with the involvement of several areas and operations on different fronts.

Commercial relations between the Bradesco Organization and its customers are also guided by CMN Resolution No. 4.949 of the Central Bank of Brazil and reflected in our Institutional Policy for Relationship with Customers and Users: [704fe27e-a696-4c0b-b9a7-fdbaaaf6a9f5](#) ([mziq.com](#))

2.1.3. Relationships with Local Communities

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

In this sense, the existing mechanisms and controls in the regulatory structure of the Bradesco Organization guide its customers to adopt, at least, the following mitigation measures:

- Identification, assessment, control, mitigation and compensation of impacts on local communities, especially those that may present risks to human rights;
- Provision of communication channels for expressing doubts, complaints and grievances;
- Adoption of practices aimed at maintaining the health and safety of impacted local communities; and
- Right to compensation in case of human rights violation.

The Bradesco Organization has a mechanism to ensure that customers and financed projects comply with the legal requirements and commitments assumed by the Bank.

2.2. Expectations regarding the responsibilities of Employees, Vendors, Customers and other related parties

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

The Bradesco Organization will periodically carry out informative and corporate education actions on the protection of human rights and expectations regarding related parties, including employees, vendors and customers.

2.2.1. Expectations regarding Employees

Bradesco Organization employees must know the guidelines of the Corporate Human Rights Policy and other mechanisms in the normative structure that aims to protect human rights, internally, in the coexistence and maintenance of a safe work environment and in commercial activities, ensuring the validity of the provided mechanisms.

Due diligence is performed through the processes established in the Corporate Social Responsibility Management System (SGRSC), which aims to prevent conflicts and continuously improve the quality of relationships and conditions in the work environment for employees, collaborators and other stakeholders, based on the Code of Ethical Conduct and the Human Resources Management Policy, in addition to other policies, internal rules and laws applicable to Bradesco's activities.

SGRSC requirements are in line with Human Rights, Children's Rights and Fundamental Rights at Work. Critical vendors (resident service providers that inherently pose a risk to health and safety of workers), for the purposes of the SGRSC, agree with these requirements by signing the Compliance and Commitment Declaration. Our commitment is to act according to principles of equity, inclusion and respect, in addition to the concept of justice based on equal rights, preservation of individuality and privacy, not admitting the practice of any discriminatory acts and moral and sexual harassment.

Bradesco is convinced that successful companies generate results for all audiences and recognize that their employees are one of the main reasons for their success. For this reason, the Organization upholds meritocracy and works to ensure that everyone is fairly rewarded for their potential and performance, including checking that employees with the same function are properly remunerated, respecting diversity. The Organization maintains a collegiate management culture, promoting annual meetings, to avoid inadvertent bias in personnel-related decisions.

In addition, within our remuneration strategy focused on sustainable results and maintenance of wage equity, we take an active role in market research and current discussions on the

subject in order to attract, retain and engage with our employees, in line with the Organization's strategy.

2.2.2. Expectations regarding responsibilities of Vendors, Customers, Partners and other related parties

The supply chain vendors must agree with the provisions of Bradesco Organization's Code of Ethical Conduct, Bradesco Organization's Code of Ethical Conduct for Professionals of the Procurement Department, Corporate Information Security Policies and Bradesco Integrity Program Standards and Competition Compliance, as well as any and all Policies, Codes and Standards available at www.bradescofornecedores.com.br, which the vendor undertakes to comply with, including its employees and agents, as well as employees and agents of its subcontractors, as applicable. Vendor contracts contain binding clauses with human rights protection, especially with regards to:

- Combating slave-like work practices, child labor and sexual exploitation;
- Acts of sexual and psychological harassment;
- Fair and favorable working conditions; and
- Abolishment of discriminatory practices, which negatively affect the access to the employment relationship or maintenance thereof, for reasons such as, among others: gender, origin, ethnicity, color, physical condition, religion, marital status, age, family situation or pregnancy.

Customers of the Bradesco Organization in credit, financing and investment operations must formally consent to the guidelines for the human rights protection applicable in the Corporate Human Rights Policy and in other inter-related policies and standards with the subject, by means of established contracts that include binding clauses for human rights protection, particularly referring to:

- Combating slave-like work practices, 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.

Commitments towards protection of the human rights of vendors and customers will be monitored in accordance with the requirements of the Environmental and Climate Social Responsibility Policy, and the Social and environmental Risk Standard. These assumptions are also applicable to other related parties, such as business partners.

3 Go Live

This section describes the procedures for implementing the Bradesco Organization's Commitment to Human Rights, namely:

- Identification and prioritization of risks;
- Communication Channels (Manifestations and Complaints Mechanisms); and
- Due diligence: monitoring internal operations, vendors, business partners and customer operations.

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.

Our processes are reviewed biannually¹ in order to map potential human rights risks in our Operations. Bradesco's activities and businesses are considered in this process, as well as the holders of rights (e.g.: direct and indirect employees, customers, local communities, business partners, etc.) according to internationally recognized human rights in the conventions observed by the Bradesco Organization.

In 2022, the process of identifying and assessing human rights risks began to consider external risks given by the Brazilian context, when related to with operational aspects of the Bradesco Organization, in addition to internally identified risks by the social and environmental risk control and management mechanisms.

Risks were assessed according to the criteria defined by the UN Principles on Businesses and Human Rights: Severity and Likelihood, and then associated with human rights under risk of impact and the holders of such rights. The following references were used in updating the Human Rights Risk Matrix² of the Bradesco Organization in 2022:

- Guiding Principles on Business and Human Rights - United Nations (2011);
- OECD Guidelines for Multinational Enterprises - Organization for Economic Cooperation 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 on Due Diligence for Responsible Business Conduct – Organization for Economic Cooperation and Development (2018); and
- Human Rights Due Diligence and COVID-19: Rapid self-assessment for Business – United Nations (2020).

This process identified 8 priority risks that represent the main human rights threats in the last update of the Human Rights Risk Matrix, all with the appropriate applicable prevention and remediation measures. These risks are presented in the [Human Rights Risk Matrix](#) of the Bradesco Organization (2022).

The 8 most significant risks identified through this update were:

Relevant issues (external and internal risks)	Rights at risk of impact	Rights holders
RIGHTS OF INDIGENOUS PEOPLES AND TRADITIONAL COMMUNITIES	<ul style="list-style-type: none"> • Right to self-determination 	<ul style="list-style-type: none"> • Indigenous peoples and traditional communities
COVID-19	<ul style="list-style-type: none"> • Right to health; • Right to life 	<ul style="list-style-type: none"> • Direct employees; • Indirect employees
CLIMATE CHANGES: SOCIOECONOMIC IMPACTS	<ul style="list-style-type: none"> • Right to health • Right to life 	<ul style="list-style-type: none"> • Communities impacted by sectors that exacerbate climate change
CORRUPTION: SOCIAL AND ECONOMIC IMPACTS	<ul style="list-style-type: none"> • Right to adequate living standards 	<ul style="list-style-type: none"> • Civil Society

Relevant issues (external and internal risks)	Rights at risk of impact	Rights holders
DATA PROTECTION AND INFORMATION CONFIDENTIALITY	<ul style="list-style-type: none"> Right to privacy 	<ul style="list-style-type: none"> Customers; Direct employees; Indirect employees; Related parties.
HEALTH AND SAFETY OF IMPACTED COMMUNITIES	<ul style="list-style-type: none"> Right to life; Right to health 	<ul style="list-style-type: none"> Local communities in funded projects
FORCED LABOUR	<ul style="list-style-type: none"> Right to remain free of slavery, servitude or forced labor 	<ul style="list-style-type: none"> Workers on funded projects and activities
CHILD LABOR	<ul style="list-style-type: none"> Right to child protection 	<ul style="list-style-type: none"> Workers on funded projects

1 - This Commitment contemplates the analysis and correlation of how the entire normative framework of the Bradesco Organization deals with the subject of Human Rights, both from an operational/commercial activity viewpoint, as well as regarding expectations with related parties and business partners.

2 - The preparation of the Risk Matrix was supported and verified by ERM - Environmental Resources Management

3.2. Corporate Whistleblowing Channels (Mechanisms for Manifestations and Whistleblowing)

Bradesco Organization's Code of Ethical Conduct and Human Resources Management Policy (exclusively for cases of harassment and discrimination), establish specific mechanisms for receiving communication of human rights issues through the Corporate Reporting Channel set forth in the websites [Institutional](#), [Bradesco Investor Relations](#), [Corporate Portal](#) or by calling 0800 776 4820 (Monday to Friday, 8:00 am to 6:00 pm, except weekends and national holidays), open to all parties interested in filing complaints. The Bradesco Organization also reports to its stakeholders the management performance in human rights-related issues in its Integrated Report, published annually.

The Organization's Corporate Reporting Channel is available to administrators, employees, apprentices, trainees, service providers and other interested parties, with anonymity, secrecy and confidentiality. Complaints related to moral and sexual harassment, discrimination, inappropriate behavior, misconduct, corruption, internal fraud, occupational health and safety, labor requirements and professional growth are received through the Corporate Complaints Channel and forwarded to the DRH-Social Responsibility for analysis, dealings and necessary

preventive and corrective actions, evaluation and maintenance of secrecy, independence, transparency, integrity and ethics, ensuring proper treatment, from receiving to completion.

Corporate Grievance Reporting Channel:

- **Electronic Form:**

Website [Institutional/Service/Complaint](#);

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

Website [Corporate Portal/Bradesco/Reporting and Grievances Channel](#).

- **Telephone Service:**

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

- **Expression Boxes:**

- **Cidade de Deus:** [located in the buildings of Cidade de Deus](#); and - **Pirituba:** located next to the vending machines of the boulevard floor.

3.3. Due Diligence: credit and financing operations, vendor monitoring, other operations

Monitoring the risks and impacts of human rights in the operations themselves, with customers, vendors and business partners is included in the scope of action of the social and environmental risk management of the Bradesco Organization.

3.3.1. Due Diligence in Credit and Financing Transactions

In credit and financing transactions, social and environmental risk management encompasses the assessment of customers who operate in sectors with potential social and environmental impact and have relevant credit exposure.

Project credit and financing operations are assessed and monitored by the Integrated Risk Control Department (DCIR), which uses the Social and Environmental Risk Standard to identify risks and impacts of human rights financed by the Bradesco Organization, subject to the Equator Principles and including the International Finance Corporation (IFC) Performance Standards and World Bank Group Health, Safety and Environmental Guidelines.

In this sense, projects inside Indigenous Lands, Conservation Units or Areas considered as Historical and Cultural Heritage protected by law or by an international organization are considered as high risk projects.

The social and environmental risk assessment process related to human rights is carried out through: querying of public lists such as the Dirty List (List of employers who have submitted workers to slave-like conditions); media research and monitoring; application of a social and environmental questionnaire; analysis of social and environmental documents and independent audit reports. For projects classified in the Equator Principles and other relevant projects, when necessary, these aspects are monitored in order to enable follow up on issues related to the relocation of communities, compliance with the requirements of regulatory bodies for traditional communities, such as FUNAI (indigenous) and Palmares Cultural Foundation (quilombolas).

Periodic monitoring of social and environmental performance relating to customers listed in public databases, such as the Dirty List, 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 records of contaminated areas, serving as support for the areas involved in their decision-making.

For project financing transactions, a due diligence process is carried out, which includes the application of an industry checklist, analysis of social and environmental studies, authorizations/licenses, media research, queries to public lists, when necessary, conditions precedent are formulated which must be complied with by the borrower before signing the contracts.

Monitoring mechanisms allow the DCIR to periodically update the Social and Environmental Relevance Matrix, through which the Bradesco Organization is able to identify the economic sectors most exposed to human rights risks, in addition to identifying the most potentially affected rights.

Additionally, there is a periodical follow-up process for actions taken by customers to regularize cases in which evidence of involvement with slave labor, child labor and prostitution is identified. From 2021, the governance process applied measures to prevent the opening of accounts and

contracting of credit transactions to individuals or legal entities proven to be involved in the use of slave-like labor, child labor or the criminal exploitation of prostitution.

Specific social and environmental clauses are also inserted, referring to compliance with environmental, labor and occupational health and safety legislation and the guidelines of the Equator Principles and the Performance and International Finance Corporation (IFC) EHS Guidelines in which the following human rights issues are addressed: race or gender discrimination; child and slave labor; human trafficking; acts that characterize moral and sexual harassment conservation of areas considered Historical and Cultural Heritage, respect for traditional peoples and communities, including indigenous peoples, quilombolas, riverside communities and, when applicable, termination conditions are included in case of non-compliance with such obligations.

In cases where the Organization approves the financing, after the effectiveness of the contract, when applicable, periodic social and environmental monitoring of the projects is started in compliance with the specific social and environmental clauses established in the contract, which consists of technical visits, analysis of independent consultancy, environmental studies of the undertakings, which will result in internal assessment reports regarding compliance, surveys with public bodies and the company, and monitoring of news released by the media. If it is found, during monitoring, that the customer has not fully complied with the social and environmental contractual clauses, the Organization can block future financing or even proceed with the early settlement of the agreement.

3.3.2. Due Diligence in the Vendor 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 carried out by the Supplier Management, which assesses the companies' compliance from the cadastral, commercial, economic, financial and social and environmental points of view. The social and environmental issues analyzed cover labor practices through public certificates, prohibition of slave or child labor, environmental risks and negative media.

After analyzing this information, the vendor is approved and adheres to our Code of Conduct and other policies and standards. Our contracts also contain clauses on forced and child labor, anti-corruption and social and environmental aspects.

In addition to the objective of economically promoting the national territory, where most of the important operational units and most of our vendors are located, the goal for the proportion of expenses of local vendors is that they are carried out in most part or 100% of the Brazilian territory.

Vendors undergoing approval and vendors with current contracts that present notes called Prohibitive RSA (082) and/or Restrictive RSA (081) (Linked to practices of work similar to slavery and/or child, sexual exploitation), and/or Environmental Infraction (233) and/or Contaminated Areas (311), must pass by social and environmental risk analysis.

Monitor and Develop

In order to mitigate risks, the Vendor Management area monitors the base of registered companies on a monthly basis. If an impending restriction is identified, the vendor is blocked for future contracts. The surveys include restrictions such as slave labor and child labor, embargoed and contaminated areas.

We also work with social and environmental monitoring and development processes. The “Bradesco Most Sustainable Vendor” Program for Social and Environmental Responsibility in the Supply Chain consists of carrying out social and environmental audits based on three pillars: Social Responsibility, Environment and Health and Safety. In the Social Responsibility pillar, we address Ethics, labor issues (balance between work and personal life), 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, providing equal opportunities for career development and remuneration; preventing all forms of harassment; combating forced and child labor), supply chain management, anti-corruption, competition, diversity, information security and business continuity.

The Health and Safety pillar also addresses governance issues (policies, standards and training.). Other points analyzed are: labor notices, work accidents, Emergency Assistance and Plan (PAE),

documentation (AVCB, NR 23 - Fire Protection, NR 9 - Environmental Risk Prevention Program, NR 7 - Medical Control Program of 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 in this pillar is the vendor's implementation of actions or programs that promote the well-being of employees, contributing to the balance between personal and professional life and to their mental health (pilates, gym, psychologists, events, etc.).

The checklist also included a specific topic to address the health crisis, in which we verify that vendors adhere to all safety protocols and provide support to employees in carrying out their activities.

One of the categories we audit is that of call center service vendors, which is a critical category from a social viewpoint, so we have included specific questions for this segment in the health and safety pillar.

After the audits, the vendor needs to establish an action plan for identified non-compliances and opportunities for improvement. The report is evaluated and monitored by the auditor, who is also available to assist and clarify the vendor's doubts.

We audit 100% of critical vendors on social and environmental issues in 2022. These were 85 companies belonging to civil works, printing of materials, clothing, wood 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 vendor in each category is also audited.

Moreover, we also have a social and environmental evaluation process for vendors, carried out by the Procurement Department 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 the respective industry, among other items.

3.3.3. Monitoring of Investments and Joint Ventures

As a signatory of the Principles for Responsible Investment (PRI), BRAM (Bradesco Asset Management) has a regulation of responsible investments, 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 that analyze the risks, opportunities and potential impacts arising from ESG aspects on the performance of its assets. In addition, we address Human Rights in BRAM's Responsible Investment Policy.

In general, the banking correspondent contracts linked to the contracts of the Joint Ventures of BradesCard and Bradesco S.A. related to the sale of credit cards, loans and receipt of invoices, have specific clauses to combat child and slave work and respect for the environment, among others, written in accordance with the best practices suggested by the various control and legal departments of the Bradesco Organization.

3 Reparation

Human rights issues will be investigated promptly, impartially and in confidentiality. Complaints regarding human rights violations are supported by the Code of Ethical Conduct, which also guarantees the right to reparation of any violations.

Regarding business activities, the Organization works directly with customers, implementing remedial actions if human rights violations are identified, even though it is indirectly linked to the adverse impact.

4 Commitments to support the positive realization of Human Rights

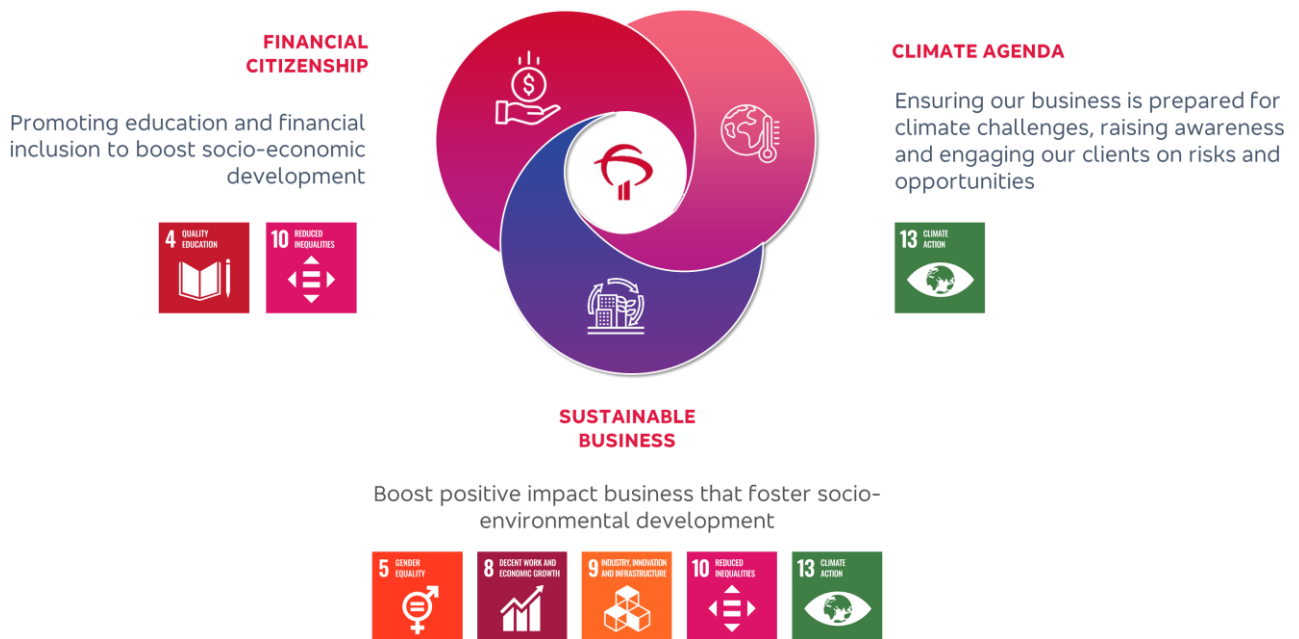
Pursuant to the Global Compact "the SDGs seek to ensure human rights, end poverty, fight inequality and injustice, achieve gender equality and empower women and girls, counteract climate change, as well as address others among the greatest challenges of our times".

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

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

As a result, new pillars were established to guide Bradesco's actions in the field of sustainability. Additionally, according to the guidelines, six of the 17 SDGs were prioritized to channel the Organization's efforts, including objectives for the promotion of human rights correlated with the prioritized SDGs.

The SDG prioritized by the Bradesco Organization in correlation with the objectives of the Sustainability Strategy are presented in the following figure:



The specific contributions of the Bradesco Organization to the SDGs, which are also reflected in the positive realization of human rights, are presented in the 2022 Integrated Report.

Find out more about the Sustainability strategy at: [Governance and sustainability strategy | Bradesco Sustainability \(banco.bradesco\)](#)