



Itaú Unibanco's Commitment to Human Rights

INSTITUTIONAL RELATIONS OFFICE - 2026

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1. GENERAL PRINCIPLES

This document, declaratory and guiding in nature, reinforces the commitment of Itaú Unibanco Holding S.A. to promoting and respecting Human Rights in all its relations – with employees, clients, suppliers, partners and society. This commitment is supported by the United Nations (UN) Guiding Principles on Business and Human Rights.

We have adopted the UN International Charter of Human Rights as a reference, which comprises the Universal Declaration of Human Rights of 1948, the International Covenant on Civil and Political Rights of 1966, and the International Covenant on Economic and Social and Cultural Rights of 1966. Additionally, we are signatories to the UN Global Compact, the Corporate Charter for Human Rights and the Promotion of Decent Work of the Ethos Institute, and adhere to the Standards of Conduct for Companies of the UN Free & Equal initiative.

Our institutional guidelines and practices are aligned with the UN 2030 Agenda. The Sustainable Development Goals (SDGs), prioritized by Itaú Unibanco and identified from our ESG strategy and business model, are presented as a reference for our institutional positioning.



2. GOVERNANCE

The governance of Itaú Unibanco's Human Rights agenda is carried out by the Institutional Relations and Sustainability Office, whose mission is to coordinate and engage the different departments of the organization in sharing the responsibility for the promotion, protection and respect for key rights and guarantees, in an integrated performance with the departments in charge of each topic.

Our Commitment to Human Rights is formally approved by a member of the Executive Committee and has national coverage, also serving as the benchmark for the conglomerate's International Units.

This commitment guides the institution's activities by way of guidelines and structured actions aimed at preventing and mitigating the risks associated with violations of Human Rights that the institution may cause or contribute to, as a result of its own operations (through employees, direct activities, products and services) or that is directly related via a commercial, contractual or institutional relationship (suppliers and partners).

This Commitment will be revisited as required, especially in light of significant issues impacting Human Rights—whether regulatory changes, evolutions in internal practices, or new risks identified in our processes. Accordingly, we ensure that its guidelines remain up-to-date, effective, and aligned with our ongoing commitment to promoting and protecting Human Rights.

2.1 Institution's Policies

We reaffirm our commitment and guide our activities with the promotion and respect for Human Rights by way of our internal policies.

Our guidelines on Human Rights are formally expressed in the Environmental, Social and Climate Responsibility Policy, which introduces the principles, strategies and guidelines to

be adhered to when running the organization's business, activities, and processes, as well as in our relations with all stakeholders.

This document translates Itaú Unibanco's institutional commitment to respecting and protecting Human Rights, as it guides its activities by promoting diversity, equity, and inclusion, ensuring a healthy and safe environment, preventing and fighting moral and sexual harassment, discrimination of any type, human trafficking, and degrading work in violation of the law (child, forced, or compulsory labor), as well as any actions or omissions that are detrimental to society or violate ethical and societal principles. These principles are supported by ethical, transparent and responsible conduct, which pervades in all spheres of the institution's activities.

Additionally, the Code of Ethics and Conduct guides the relations with internal and external stakeholders, such as clients, shareholders and investors, suppliers, competitor, the public sector, the third sector, the media and society in general. Among other aspects, this document ensures the rights of collective bargaining and freedom of association with political parties, freedom of religion, and freedom of association with unions for our employees, in addition to addressing privacy and information security issues.

We have other policies to address specific issues, such as the Corporate Corruption Prevention Policy, the Corporate Policy for the Prevention of Illegal Acts, the Corporate Information Security and Cyber Security Policy, among other policies that supplement the former.

These policies and procedures provide guidance on preventing illicit acts, as well as addressing privacy and information security issues, in conformity with legal and regulatory standards. Among other aspects, these guidelines address the risk profile of clients, employees, partners, and operations, promoting proportionate and effective action. We also set out processes to ensure the diligence and transparency of our client relations, as outlined in our policies. Among these processes, we highlight those aimed to evaluate clients, also known as Know Your Customer (KYC) and, when applicable, the inclusion of

contractual clauses, such as an anticorruption clause. Any noncompliance with these guidelines may result in the adoption of contractual measures and consequence management, as provided for in our internal policies.

We also provide formal and accessible channels for expressing opinions and reporting complaints, guaranteeing active listening, confidentiality, and appropriate handling of the demands received, in accordance with our Code of Ethics and Conduct and related policies.

2.2 Due Diligence Process in Human Rights

Since 2015, we have regularly carried out a Due Diligence process in Human Rights to identify, prevent, mitigate and account for the impacts on Human Rights that the company may cause or contribute to, arising from their own activities or directly related to, through its commercial, contractual or institutional relations.

This process is carried out with the support of a specialized independent consulting firm, when applicable and according to the methodological strategy of the cycle, which assesses the Institution's exposure to the risks of violation of Human Rights of any person or group potentially impacted. To this end, we take into account the Brazilian regulatory and socioeconomic context, as well as any existing measures to prevent, mitigate and remediate these risks.

Learn more about this process in the ESG Report 2025 (page 221).

3. RISK MANAGEMENT

The following topics present relevant Human Rights issues considered within the scope of Itaú Unibanco's institutional activities, as well as examples of guidelines and practices guiding the responsible management of these issues, without prejudice to specific policies and processes for managing environmental, social and climate risks.

We ensure the respect for and protection of Rights through the implementation, compliance with, and monitoring of guidelines, as conducted by the relevant governance departments and forums. These guidelines are incorporated into existing policies and processes, aimed to prevent, mitigate and respond to risks.

In addition to the Environmental, Social and Climate Responsibility Policy (“PRSAC”, in Portuguese), we have an Environmental, Social and Climate Risk Policy, which sets out the guidelines and fundamental principles for the governance and management of environmental, social and climate risks, addressing the key risks associated with the Company's operation through specific procedures and forums for deliberation and guidance purposes.

We highlight our key measures for managing the risks of violation of Human Rights, as follows.

3.1 Direct Risks

Direct risks refer to a company's direct responsibility for potential offenses caused by such company, i.e., related to actions taken by its employees or management members. Learn about the respect, protection, mitigation and remediation practices related to this type of risk below.

3.1.1. Diversity and inclusion

We are permanently committed to valuing diversity by promoting inclusion and equal opportunities in a safe and respectful environment. Promoting diversity means respecting and understanding the different realities and needs of our stakeholders – including clients, employees, shareholders, investors, suppliers, business partners and society in general, recognizing the diversified origins, sexual orientations, races, genders, ages, cultures, beliefs, nationalities, social or civic status, and disabilities.

We continuously work to avoid all forms of discrimination, whether in the hiring, promotion, compensation and dismissal processes or in our communications and interactions with different stakeholders. To this end, we adopt policies and practices that reinforce our ethical and social commitment in an agenda of transformation focused on equity and inclusion.

Different institutional policies guide everyone regarding the commitment to diversity, inclusion, and combating discrimination, such as the Corporate People Policy, which has a chapter on Diversity and Inclusion, the Code of Ethics and Conduct, and the Commitment to Diversity Charter.

We have an ongoing dialogue on diversity and inclusion issues, aimed to disseminate concepts that are essential to understanding the need for and relevance of inclusion initiatives and the fight against discrimination. We provide all employees with a learning path covering basic concepts of diversity and inclusion, in a practical, objective, and accessible way, as well as a Guide in Preventing and Handling Harassment and Discrimination in the Workplace, in addition to guidance so that employees can learn to recognize and report any suspicious cases.

Additionally, client service teams must undergo mandatory training, available to all, on empathy in client service, addressing diversity and inclusion issues, guaranteeing Human Rights and working with socially and financially vulnerable people.

Learn more in the ESG Report 2025 (pages 160 and 303).

3.1.2 Equal Treatment among Employees and Third Parties

Respect and equal treatment are provided for in Itaú Unibanco's Code of Ethics and Conduct, and the key points are as follows:

- **Labor relations:** "We value our employees by respecting Human Rights and promoting diversity. To this end, we adopt policies and practices to prevent and fight all kinds of discrimination, harassment, prejudice, and indecent work conditions (such as child or forced labor)".
- **Professional attitude:** "It is necessary to promote relations based on cooperation and respect for dignity and for equal treatment, thus contributing to an environment that is conducive to development and healthy interactions, aiming at maintaining a cooperative and friendly environment".

As part of this commitment, Itaú Unibanco adopts specific measures when hiring third parties to ensure the adherence to the same ethical and legal standards applied to the organization. Among these measures, we highlight the inclusion of specific clauses in contracts to ensure compliance with labor legislation, as well as adherence to sustainability recommendations, such as:

- preventing and combating moral and sexual harassment and any form of discrimination;
- promoting a safe and respectful environment;
- appreciating, training and employing people with disabilities;
- promoting diversity, ensuring inclusion and equal opportunities for all;
- ensuring proper working conditions; and
- expressly rejecting child, forced or compulsory labor.

Learn more in the ESG Report 2025 (page 160 and 303).

3.1.3 Accessibility

By considering different profiles, we increase the autonomy and security of everyone during their journey with us. Therefore, accessibility is an integral part of our culture of diversity and inclusion, as well as a pillar in the design of our projects, products, and services. This commitment is formalized in our Corporate Accessibility Policy, which establishes principles, responsibilities, and guidelines.

As part of this commitment, we have a specialized and dedicated accessibility team, working in partnership with various departments to ensure the application of accessibility, with the effective engagement of people with disabilities in tests and research.

We adopt the accessibility standards of the Web Content Accessibility Guidelines (WCAG/W3C) in our digital channels, and the technical references of the ABNT NBR 9050 standard in our physical channels.

Additionally, in partnership with a provider of accessible digital solutions, we offer Maya, a virtual avatar translator for Libras (the Brazilian Sign Language), available on our web channels. Furthermore, our branches are designed and modernized to ensure accessibility and autonomy, with adapted ATMs, simple text language, voice resources, and items such as cane holders, implemented in 2025, to facilitate self-service for people with disabilities and the elderly.

Learn more in the ESG Report 2025 (page 101).

3.1.4 Freedom of Association

Itaú Unibanco assures its employees the full right to free union association, as well as the freedom to participate in union activities, in compliance with Brazilian legislation in force

and the collective bargaining agreements of each professional category represented in the financial sector. We recognize and respect the legal prerogatives of representatives elected to executive positions in the unions, ensuring they have the conditions required to perform their duties.

In Brazil, employees elected to executive positions perform union representation duties. Part of these professionals work full time for the Union, and are guaranteed full benefits and basic salary in the same conditions as if they were performing their professional duties with the Bank.

Additionally, Itaú Unibanco recognizes the importance of social dialogue and supports the union activities, allowing unions to carry out unionization campaigns and, when requested, to hold meetings with the attendance of representatives of the Union Relations department, supervisors and employees of the Bank, to seek negotiated solutions in a respectful manner and in line with ethical principles.

In the International Units, freedom of association is governed by applicable local legislation and in line with the ethical principles of the Code of Ethics and Conduct.

Learn more in the ESG Report 2025 (page 188).

3.1.5. Health and Safety

Occupational Health and Safety (OHS)-related strategies, guidelines, roles and responsibilities are outlined in our Internal Policy on Health, Safety and Wellbeing and in Itaú Unibanco's Commitment to Occupational Health and Safety, in which we also reinforce our guidelines with clients, suppliers, partners and society.

The Occupational Health, Safety and Wellbeing Management is made up of analysts, coordinators, managers, superintendents, officer, and a specialized technical team, as well

as members of the Specialized Safety Engineering and Occupational Medicine Service (SESMT).

OSH management follows the PDCA methodology (“Plan” – planning, “Do” – doing it, “Check” – analyses of results and “Act” – Action), used to control the ongoing improvement of processes and products. Under this model, issues are prioritized and action plans are drawn up and put into practice, with indicators set out for operational and strategic assessments. Adjustments are made throughout the process, based on the evolution of results, to ensure the best possible performance on a continuous basis.

Among the actions scheduled for the control of the main requirements in Health and Safety the highlights are:

- Risk Management Program (PGR);
- Program to support the return to work;
- Occupational medical exams;
- Training and supporting materials on mental health and ergonomics;
- Internal Week of Prevention of Occupational Accidents (SIPAT);
- Investigations of Occupational Accidents; and
- Inspections to assess and adapt workplaces to different needs.

More actions and procedures can be found in the ESG 2025 Report (page 207).

3.1.6 Moral and Sexual Harassment

We do not tolerate any moral or sexual harassment or any behavior that may damage the personal integrity of any individual in the workplace.

Any cases of moral or sexual harassment investigated and considered legitimate are subject to disciplinary measures, guided by Itaú Unibanco’s Policy of Guidance and Application of Disciplinary Standards.

Additionally, we regularly reinforce the values of our culture with affirmative actions, promoting and expanding the awareness of diversity and encouraging our employees to express themselves and not accept situations involving threats, persecution, exclusion, shaming and harassment.

Among the main actions, we continue to encourage the reading of the Guidelines on Harassment and Discrimination in Labor Relations, a supplementary material to the Code of Ethics and Conduct that clarifies important concepts and reinforces our commitment to zero tolerance for moral and sexual harassment. We also conduct communication, disclosure, and incentive initiatives for our employees, across different channels and formats, in connection with Harassment and Discrimination in the Workplace Training.

The training program reinforces the concepts of our Guide and describes practical examples so that employees can learn and recognize and address situations involving moral and sexual harassment.

Learn more in the ESG 2025 Report (page 303).

3.1.7 Remuneration

To ensure employees have fair working conditions and compensation, we promote meritocracy and transparency. To avoid any form of discrimination, we have compensation policies and processes that respect diversity. The governance of this practice is carried out by the Personnel Department, which, through meetings of joint bodies, monitors the compliance with the established guidelines, curbing discrimination and prejudice in compensation practices.

Annually, the key findings of the pay equity review are submitted to the governance levels and executive leaders for follow-up. The promotion of pay equity has been a strategic

priority, reflected in the continuing studies conducted by the Bank based on criteria set forth by Brazilian legislation.

Our compensation principles and practices are formalized in the Compensation Policy, aimed to attract, reward, retain and encourage management members and employees to run the business in an ethical, responsible, and sustainable manner. We adopt compensation and benefit strategies based on parameters such as salary surveys in the market, responding to industry surveys, and attending specialized forums.

Learn more in the ESG Report 2025 (page 193).

3.1.8 Corruption Prevention

We understand corruption as the act of suggesting, offering, promising, granting, soliciting, requiring, accepting or receiving, directly or indirectly, whether by demanding it or not, to/from people or companies from the public or private sectors or third sector organizations, from any country, undue advantages of any nature in exchange for the performance or omission to perform acts that are inherent in their duties, operations or activities aimed at benefits for themselves or third parties.

The Corporate Corruption Prevention Policy has been implemented to strengthen our commitment to proactively working in the prevention and fight against corruption in all its forms for the purpose of coordinating actions and complying with legislation in force and internal policies. Itaú Unibanco has an Integrity and Ethics Program, provided for in the Corporate Policy on Integrity, Ethics and Conduct, which is applicable to all employees and management members, in Brazil and abroad.

This Integrity and Ethics Program, managed by the Corporate Compliance Office, covers a set of guidelines and processes to mitigate the Bank's risks of exposure to illicit acts and to ensure compliance with the Code of Ethics and Conduct and our principles and values. Governance on the prevention and combat of illicit acts is carried out by the Board of Directors, Audit Committee, Operational Risk Committees, Risk and Capital Management

Committee and the Anti-Money Laundering Committee. This program is applied to the Itaú Unibanco Conglomerate and its companies in Brazil and abroad.

With an eye to the ongoing anti-corruption training of employees, in addition to the Integrity and Ethics Program, we provide specific annual training for the departments/activities posing a higher risk, in accordance with the risk-based approach criteria, such as for employees of rating agencies and employees who work with foreign exchange operations.

Learn more in the ESG Report 2025 (page 254).

3.1.9 Privacy and Information Security

The privacy and information security governance is an integral part of the risk management practices and of our strategy. Our purpose is to foster a safe, reliable environment by ensuring privacy and protecting the personal data of our clients, employees, business partners, suppliers, society and other data subjects.

By adopting a structured and preventive approach, we reaffirm our commitment to Human Rights in data handling and management, in compliance with legislation in force and the highest ethical and corporate responsibility standards. In our activities, we comply with the legal requirements¹ and resolutions for the financial sector². Our privacy and data protection strategy prioritizes training, aimed to raise awareness among employees, and the secure development of solutions for our clients. As a result, from their inception, all our products and services are designed with our clients' privacy and security in mind, including

¹ General Personal Data Protection Law (LGPD) and related legislations.

² Resolution No. 4,893/2021, of the National Monetary Council (CMN). Resolution No. 85/2021, of the Central Bank of Brazil (Bacen). Resolution No. 35/2021, of the Brazil Securities and Exchange Commission (CVM). Circular No. 638/2021, of the Superintendency of Private Insurance (Susep).

both these topics and their corresponding guidelines in the daily life of the business areas and technology departments.

Since 2018, our privacy program has brought together a multidisciplinary group, with the support of the technology, legal, compliance, risk and security departments working together with the business areas to ensure protection and transparency while addressing data privacy and protection, by developing and implementing the best market practices related to such topics.

The privacy and data protection processes and controls are also subjected to regular risk assessments, through internal and external audits, also carried out by an independent certifier, aimed at ensuring the reliability of practices and processes that make use of personal data, thus guaranteeing and evidencing our commitment to Human Rights in data management.

Our cyber security strategy has been designed to preserve data security, minimize risks of service unavailability, protect integrity and prevent information leakage. To this end, we use the expanded perimeter protection strategy, a concept that believes information must be protected wherever it is – whether within the Bank’s infrastructure, in a cloud service, at a third-party or at an international unit, for example, taking into account the entire information lifecycle.

We adopt strict control processes aimed at detecting, preventing, permanently monitoring and immediately responding to attacks and attempted hacking of our infrastructure, thus ensuring security risk management and the build-up of a strong foundation for an increasingly digital future.

We have a set of policies and documents³ that cover our entire operation, which is periodically updated, and set out the guidelines, standards, general rules and responsibilities of the data privacy and protection and information security process, in

³ Corporate Information Security and Cyber Security Policy, and Privacy Policy.

conformity with legal and regulatory aspects, to ensure the protection of important information.

It is worth noting that information is made available to personal data subjects about the collection and processing of their data in our activities⁴. Additionally, taking into account the data lifecycle, we have the practice of cleaning up the personal information of data subjects through procedures designed to keep only the necessary information in our environments to comply with the purpose of data usage.

We have a robust and friendly awareness-raising program, with training to emphasize the importance of privacy, data protection and cyber security throughout the Company. By means of our integrity and ethics program, all employees are trained on information security, privacy and LGPD in the scope of compliance with Itaú Unibanco's Code of Ethics and Conduct and principles and values.

To mitigate key risks and foster information security, privacy and cyber security, we have several control practices and procedures, conducted in an integrated manner with the Business areas and Technology departments, to ensure the maintenance of the architecture of solutions and products with the highest level of security, tracking existing trends and ensuring data control and protection.

Learn more in the ESG Report 2025 (page 284).

3.2 Indirect Risks

These refer to possible Human Rights violations committed by agents with whom the Bank has a business, contractual, or partnership relationship. Learn about the respect and protection practices related to this type of risk below.

⁴ This information may be accessed on our dedicated privacy page, in section "How do We Obtain Personal Data?", available on <https://www.itaubr.com.br/privacidade>

3.2.1 Child Labor, Compulsory Labor and Human Trafficking

We recognize that compulsory labor, the use of child labor and the exploitation of prostitution, which may also be related to human trafficking, are serious violations of Human Rights. Therefore, we have adopted a List of Excluded Activities consisting of activities that contradict the Bank's principles and values.

To monitor the potential occurrence of these practices by the counterparties with whom the bank interacts, we have adopted a specific due diligence process that covers credit and insurance relationships, as well as the engagement and/or renewals of suppliers. Our procedures include checking the Register of Employers for any clients who have subjected workers to compulsory labor (established by Interministerial Ordinance MTPS/MMIRDH No. 4 of May 11, 2016) and monitoring any possible negative mention of the counterparty in the media. If found, these occurrences are analyzed by specialized teams and may result in the systemic blocking of CNPJs (Corporate Taxpayer's Registry) and CPFs (Individual Taxpayer's Registry) in any of the segments served by Itaú Unibanco. As a result, blocked counterparties are prevented from accessing new credit, purchasing insurance policies, and maintaining or renewing supply relation.

Additionally, our financing operations include contractual clauses that require the absence of links to the aforementioned practices and compliance with social and labor laws.

Learn more in the ESG Report 2025 (page 51).

3.2.2 Embargoes

The international community has been increasingly more attentive to acts or behaviors of countries, governments, groups, companies, or individuals that violate the universal precepts of peaceful coexistence, either in connection with civil or military conflicts,

terrorist activities and their financing, or those related to illicit or reprehensible practices, such as drug trafficking, compulsory labor, fraud and money laundering. In reprisal, some jurisdictions or international organizations have established embargoes, which consist of the total or partial ban on doing business with certain countries, groups, individuals and companies.

We have adopted the embargo guidelines established by the Office of Foreign Assets Control (OFAC), the United Nations (UN), the European Union Council, and Her Majesty's Treasury (HMT). We also follow the Cuba Restricted List, the Cuba Accommodation List, which are published exclusively by the U.S. Department of State, and the Bureau of Industry and Security (BIS) restrictive list, published by the U.S. Department of Commerce.

Learn more in the ESG Report 2025 (page 265).

3.2.3 Credit Granting

Environmental, Social and Climate Risk management in credit risk management is based on methodologies and tools guided by the best international and national practices applied to identify, measure, assess, monitor and disclose risks.

Environmental, social and climate criteria, as well as the applicable consequences, are assessed through four analyses: List of Excluded Activities, applicable to all clients and suppliers; Sector Categorization, applicable to all legal entity clients; Client Categorization, applicable to large corporate clients; and Sensitive Sectors, applicable to large corporate clients and Agribusiness clients.

Learn more in the ESG Report 2025 (page 33, 129, 243 and 275).

3.2.4 Investments

Itaú Asset Management has a proprietary methodology that integrates environmental and social variables into traditional company valuation models. This valuation identifies eight multi-sector dimensions, some of them focused on the stakeholder relation – Workers, Communities, Clients and Suppliers – and some of them focused on environmental dimensions – Water, Energy and Materials, Biodiversity and Land Use, Waste Management and Climate Change. It prioritizes the critical dimensions for each sector when assessing the companies. Part of this methodology consists of the engagement with investees for the purpose of establishing a constructive dialogue, deepening the understanding of Environmental, Social and Governance (ESG) issues, disseminating best practices and mitigating possible risks.

Also, with regard to financed projects, any risks identified can be mitigated through specific contractual obligations, and worth mentioning is the implementation of action plans, the execution of which is monitored throughout the duration of the financing contract.

Learn more in the ESG Report 2025 (page 36, 66 and 82).

3.2.5 Mergers and Acquisitions

Prior to formalizing any proprietary M&A transaction – including joint ventures - specifically when it involves the acquisition of a preexisting legal entity, we conduct a thorough due diligence process to ensure that the target Company is in compliance with applicable legislation and to identify any risks associated with the operations. This assessment includes legal, labor, accounting, tax, litigation, anti-corruption and anti-money laundering (AML) aspects and possible indications of compulsory labor.

Additionally, agreements signed within the scope of M&A transactions include specific representations and warranties clauses, requiring that the counterparties comply with all applicable laws and regulations.

3.2.6 Supplier Management

Our Supplier Relationship Code supplements the Code of Ethics and Conduct, establishes the principles and values that govern the interactions between our employees and our suppliers through the declaration of values that define the expected conduct in commercial relations, with the purpose of achieving the same transparency, legality, quality and reliability we have with our clients in the interactions with our suppliers and service providers. As of its release, in November 2016, the electronic acceptance of this code is required from all suppliers in Brazil thus reinforcing our commitment to an ethical and responsible supply chain.

As a supplement to the Supplier Relationship Code, in 2020, we launched the Environmental and Social Responsibility and Positive Impact Guide for Suppliers, aimed at sharing environmental and social guidelines, encouraging our suppliers to adopt commitments to value Human Rights and diversity in their agendas and promoting sustainable practices in our supply chain.

Additionally, our standard contract includes specific provisions on the monitoring of critical topics, such as: respect for Human Rights, compliance with labor obligations, occupational health and safety standards, environmental and social compliance, environmental legislation, corruption prevention, damage accountability, and information security. These requirements are also applicable to the supply chain of our business partners.

We periodically carry out external audits at suppliers classified as critical in order to map and assess their respect for Human Rights in addition to environmental and social issues. If irregularities are identified, action plans may be developed to help such supplier address

this issue or, in more critical situations, penalties may be applied that may lead to the suspension or termination of the respective contract. These practices apply to all units in Brazil.

Learn more in the ESG Report 2025 (page 227).

3.2.7 Corruption Prevention (Third Parties)

In addition to actions with employees, we apply the Corporate Policy for the Prevention of Unlawful Acts, which establishes guidelines on anti-money laundering, counter terrorism financing and fraud prevention, in compliance with the legislation and regulations in force and the best local and foreign market practices. This policy encompasses a set of actions that must be adopted to identify clients, suppliers, including outsourced service providers, business partners and employees, based on the following pillars:

- Client Identification Process;
- “Know Your Customer” (KYC) process;
- “Know Your Partner” (KYP) process;
- “Know Your Supplier” (KYS) process;
- “Know Your Employee” (KYE) process;
- Monitoring, Selection and Analysis of Suspicious Operations or Situations; and
- Reporting Suspicious Transactions to Regulators.

Learn more in the ESG Report 2025 (page 254).

3.2.8 Working with the Community and Government

We have assumed the commitment to having an active dialogue with our stakeholders as a way of developing opportunities, fostering a positive impact, reducing risks and bringing about new prospects and innovation. We recognize that we are an important part of society and have the opportunity to both impact and be impacted by it.

Our engagement is established through dialogue with the many different stakeholders so we are able to take into account different points of view and needs, and to share our initiatives to learn and share best practices, share common values and build long-lasting relationships that ensure respect and the promotion of Human Rights.

We are always attentive to the needs and opportunities in regions where we have large operational and business centers. This process enables us to study ways of working with the organized civil society and government bodies to support and implement projects in these locations.

We keep in contact with government entities for the purpose of contributing to the development of public policies aligned with both the organization's and society's interests on topics such as safety, consumer rights, urban mobility, fiscal and tax issues and environment, so that our institutional environment keeps constantly evolving.

By considering sectoral and size criteria, when applicable, we conduct an individualized risk exposure analysis for clients, taking into account social criteria such as the impact on traditional communities and local population, occupational health and safety indicators, and Human Rights violations. Going beyond the client perspective, these same criteria are also applied to the operations/product perspective when financing projects.

Learn more in the ESG Report 2025 (page 51, 219 and 270).

3.2.9 Data Privacy (use by Third Parties)

In line with the expanded perimeter concept, which includes outsourced companies in our scope of operation, we have improved our risk management related to service providers and business partners. This includes the improved governance of third parties and the monitoring of a cyber security rating for highly-critical service providers, including the adoption of new solutions to monitor security in cloud environments of our

critical supply chain, thus allowing for better visibility and significant reduction of security risks at such service providers.

Our contracts with third parties – service providers and business partners – have confidentiality and privacy clauses that must be strictly followed. Third parties are classified based on criteria such as type of information to which they have access, the size of the company and the type of service. Depending on the classification, requirements regarding the protection of the third party infrastructure range from providing technical security recommendations to onsite validation of the controls declared, with the monitoring of any corrections and improvements implemented by third parties.

For those service providers classified as most critical, we perform periodical scans of their technological environments and monitor the corrections of any vulnerability identified. This aims at ensuring, in a sustainable and collaborative manner, the protection of business information, data from clients, employees and our computer environment, as well as at meeting applicable regulatory and legal requirements.

We also have a structured privacy risk assessment flow applied to our service providers involved in processing any personal data or sensitive personal data. After this assessment, third parties are classified by risk level for the purpose of fostering and strengthening the reliability of our flows in a third-party environment as well.

We adopt the main market frameworks as the basis for ensuring the creation of risk-mitigating processes. Our main processes are certified by independent entities concerning the ISO 27001⁵ and ISO 27701⁶ standards. These certifications apply to our Information

⁵ ISO 27001: it defines the best practices for identifying, reviewing and implementing controls to manage information security risks and protect the confidentiality, integrity, and availability of business-critical data.

⁶ ISO 27701: an extension of the ISO 27001 standard, it provides guidelines and requirements on the protection of the data subjects' privacy, ensuring the reliability of our flows and engagement with the topic, with security in our governance and personal data management for compliance with the General Personal Data Protection Law (LGPD).



Security Management System (ISMS), which considers information security governance processes and information security risk assessment, the Security Operations Center (SOC), which addresses the handling of information security incidents, information security architecture, vulnerabilities in the computing environment and logical access management, and Itaú Unibanco's governance for the processing of personal data, in its capacity as personal data Controller.

Learn more in the ESG Report 2025 (page 284).

4. REPORTING CHANNELS

We put in preventive efforts to mitigate potential risks of human rights violations and promote mechanisms for reparation and support for victims in cases of violation.

As a fundamental part of honor our commitments to ethics, we have reporting and whistleblowing channels capable of identifying, investigating and forwarding to the relevant departments in charge any conducts contrary to this Commitment in a respectful and ethical manner. These channels are open to all holders of rights (clients, non-clients, employees, suppliers, business partners, and society).

All complaints and reports received are investigated by the departments in charge, who follow internal policies with impartiality, confidentiality, privacy, and protection against retaliation, keeping a track record of the investigation process. We also proactively monitor situations involving suspected misconduct. In both situations, after investigating and confirming the occurrence of any irregularities or illicit acts, appropriate measures are taken regarding those involved.

Learn more in the ESG Report 2025 (page 298).

4.1 Whistleblowing Channel

We provide a Whistleblowing Channel for receiving and investigating reports on any illicit acts and misconduct involving employees, management members, suppliers, and service providers of the Itaú Unibanco Conglomerate, in compliance with CMN Resolution No. 4,859/2020.

This channel is available 24 hours a day, seven days a week, and can be accessed by any stakeholder (clients, non-clients, employees, suppliers, business partners, and society in general) to report situations such as internal fraud, money laundering, corruption (Law No. 12,846/2013), conflicts of interest, abusive outbound telemarketing, conduct resulting in

environmental degradation due to the company's activities, or other practices that violate our ethical principles.

Reports can be made anonymously or on an identified basis, and in all cases, the confidentiality, protection of the whistleblower's identity, and prohibition of any form of retaliation against those who, in good faith, report suspicions, questions, or concerns is guaranteed. Complaints received are investigated impartially by the internal departments in charge, according to the methodology and governance established in corporate policies.

4.2 Internal Ombudsman's Office

The Internal Ombudsman's Office is our internal channel in place, which is an independent department, operating with full autonomy in the organization, and reporting directly to the CEO. It is aimed to help build a company that values the respect and the integrity in all relationships and seeks to achieve its goals without deviating from ethical values in an environment where everyone is proud to work.

Guided by trust, dialogue, transparency, a sense of ownership, integrity and ethics, this channel addresses complaints, suspicions, reports, and grievances regarding interpersonal conflicts and conflicts of interest in the workplace, as well as discrimination, moral or sexual harassment, disrespect, and other ethical deviations and behaviors contrary to institutional policies.

The channel is available 24 hours a day, seven days a week, to all employees, management members, suppliers, and business partners, through the contact channels stated in Itaú Unibanco's Code of Ethics and Conduct and on the corporate portal.

The analysis of cases is carried out exclusively by the Internal Ombudsman's Office, and decisions are independently made based on the Organization's guidelines, as documented in our institutional policies.

Incidents in International Units are addressed by the local channels with a framework ready to receive complaints, engage the partner departments in the investigation as required, and assess the best way to handle them. However, it is also noteworthy mentioning that the Internal Ombudsman's Office may be called to step forward to help settle the conflict upon the impossibility of engaging the aforementioned departments and in some specific situations described in internal policies.

4.3 External Ombudsman Office

The External Ombudsman's Office operates as a last resort for handling complaints in cases whenever a client is not satisfied with the solution presented by the primary client service channels.

In partnership with our other internal departments, the External Ombudsman's Office helps assess and develop retail products and services, ensuring the client perspective and promoting adequacy, transparency and client satisfaction.

Additionally, this channel has a constructive relationship with the National Consumer Protection System (SNDC) and regulatory bodies, contributing to improve and strengthen consumer relations.

Another important pillar of the External Ombudsman's Office's activities is to improve the internal processes and ensure the effectiveness of the ongoing improvement process (Management of Clients' Requirements), ensuring the involvement of senior management.

5. FINAL CONSIDERATIONS

For us, ethics and respect are non-negotiable. Any act that violates the Human Rights inherent in any individual is inadmissible and intolerable. We seek to develop our diligence through the ongoing improvement of our risk control mechanisms, and procedures to receive, investigate, mitigate and remediate any harmful impacts, in addition to the ongoing mapping of new work opportunities to improve our practices and ensure the longevity and credibility of our business. For us, respecting and protecting the rights of every human being is a daily commitment to the sustainable development of society. In line with our commitment to transparency, other initiatives based on the guarantee and promotion of Human Rights are presented in our ESG Report 2025.

Published: June 2026

1st version: June 2014