BB TECNOLOGIA E SERVIÇOS

COMPLIANCE AND ANTI-BRIBERY POLICY

v.13

COMPLIANCE AND ANTI-BRIBERY POLICY

1. RESPONSIBLE AREA(S)

1.1 Executive Management of Risks, Compliance and Control

2. SCOPE

2.1 This policy guides the performance of BB Tecnologia e Serviços, considering the specific needs and the legal and regulatory aspects to which it is subject.

3. OBJECTIVE

3.1 Communicate to all stakeholders BBTS' commitment to integrity, ethics and compliance, through the maintenance and continuous improvement of the Compliance Management System, integrated with organizational processes and business activities. The system is based on governance, internal controls and risk management mechanisms aimed at preventing, detecting, monitoring, treating and responding to deviations from compliance and integrity, including those related to money laundering, bribery, corruption, terrorist financing and the financing of the proliferation of weapons of mass destruction, observing the legal, regulatory, regulatory obligations and other commitments assumed by the company.

4. REGULATION

4.1 Regulations and other references that guide the performance and application by BBTS:

4.1.1 Law No. 9,613/1998 – Prevention of Money Laundering (AML).

4.1.2 Law No. 13,260/2016 – Anti-Terrorism Law.

4.1.3 Law No. 12,846/2013 – Brazilian Anti-Corruption Law.

4.1.4 Decree No. 11,129/2022 — Regulates Law No. 12,846/2013.

4.1.5 Law No. 12,813/2013 – Conflict of Interest within the Federal Executive Branch.

4.1.6 BBTS Bylaws.

4.1.7 BBTS Code of Ethics, Conduct and Integrity.

4.1.8 BBTS Compliance Program.

4.1.9 ABNT NBR ISO 37301:2021 — Compliance Management System.

4.1.10 ISO 37001:2025 — Anti-Bribery Management System.

4.1.11 CGPAR Resolution No. 48, of 09/06/2023.

4.1.12 Law No. 13.810/2019 - Sanctions imposed by United Nations Security Council resolutions

5. PERIODICITY OF REVIEW

5.1 This Policy shall be reviewed at least annually or, extraordinarily, at any time, and submitted to the

competent bodies for deliberation, as provided for in the bylaws.

6. CONCEPTS

6.1 **Public administration:** Bodies and entities that perform the administrative activity of the State, in any of the spheres: Federal; State (including the Federal District); and Municipal.

6.2 **Foreign public administration:** State bodies and entities or diplomatic representations of a foreign country, at any level or sphere of government, as well as legal entities controlled, directly or indirectly, by the public authority of a foreign country.

6.3 **Regulatory environment:** Set of legal and external rules associated with its activities and that are monitored for adequacy and compliance.

6.4 **Conflict of interest:** Situation generated by the confrontation between public and private interests that may compromise the collective interest or improperly influence the performance of public function, under the terms of Law No. 12,813/2013.

6.5 **Compliance:** acting in accordance with internal and external laws, rules and regulations

6.6 **Compliance Officer:** Professional responsible for monitoring the activities performed in the organization in order to ensure alignment with regulations and legislation, with compatible independence and authority.

6.7 **Corruption:** Includes, in accordance with Law No. 12,846/2013 and related legislation:

6.7.1 guarantee, promise, offer or give, directly or indirectly, an undue advantage to a public official or third parties related to him/her;

6.7.2 finance, fund, sponsor, induce, contribute or subsidize the practice of an unlawful act;

6.7.3 improperly obtaining, maintaining or directing business;

6.7.4 defraud or manipulate bidding procedures;

6.7.5 hinder investigation or inspection;

6.7.6 use intermediaries to conceal or conceal beneficiaries.

6.8 **Due diligence:** Process of analysis and verification of information from individuals and legal entities, with the objective of identifying risks and opportunities related to integrity before and during business relationships.

6.9 **Financing of the proliferation of weapons of mass destruction (FPADM):** Allocation of resources, directly or indirectly, by any means, for the purpose of supporting, promoting or facilitating the proliferation and/or use of weapons of mass destruction.

6.10 **Terrorist financing (TF):** The act of providing, capturing, transferring, making available, custody, or using financial resources, assets, or values, directly or indirectly, for the purpose of supporting, enabling, facilitating, or carrying out terrorist activities, terrorist organizations, or individuals involved in terrorism, even if the resources have a lawful origin.

6.11 **Anti-bribery function:** performed by a professional or area with independence and adequate resources to supervise, guide, monitor and evaluate the effectiveness of the Anti-Bribery Management System.

6.12 **Money laundering (LD):** process in which profits generated from illegal activities are modified or hidden in an organization's transactions so that they can appear to have a lawful origin.

6.13 **Facilitation payment:** Any payment, even if of a small amount, to accelerate, facilitate or ensure the execution of a routine act by a public or private agent.

6.14 **Compliance Program:** Governance instrument composed of guidelines aimed at preventing, detecting and correcting BBTS' exposure to integrity threats, encouraging the effective application of the Code of Ethics, Conduct and Integrity, seeking to mitigate acts harmful to the Public Administration, national or foreign.

6.15 International sanctions: restrictive measures imposed by countries, economic blocs or international organizations against specific States, entities, individuals or regions, with the aim of limiting or prohibiting certain economic, commercial or financial activities.

6.16 Compliance Management System: a set of interrelated elements used to establish policies, objectives, processes and controls aimed at promoting and demonstrating the organization's compliance with its compliance obligations.

6.17 **Bribery:** The action of offering, promising, granting, soliciting or receiving an undue advantage to induce someone to perform, omit or delay an official act or improper act, for one's own benefit or that of third parties.

7. STATEMENT

7.1 We maintain areas dedicated to compliance and integrity management, with independence of action and functional reporting to the Company's CEO.

7.2 We maintain a Compliance Program disseminated to all parties related to BBTS, with continuous actions of acculturation, communication and mandatory and periodic training, aimed at all levels of the organization.

7.3 We maintain and continuously improve the Compliance and Anti-Bribery Management System, promoting integrity and ethical performance, under the responsibility of all employees and Senior Management. Everyone who relates to BBTS must comply with the Code of Ethics, the Compliance Program and the Company's normative guidelines.

7.4 We make decisions based on legal, integrity and anti-bribery obligations and best market practices.

7.5 We direct organizational units to maintain updated and accessible policies, standards and procedures, with a clear definition of responsibilities.

7.6 We repudiate and do not tolerate acts of money laundering, bribery, extortion, kickbacks, fraud, corruption, financing of terrorism and the proliferation of weapons of mass destruction, and any other unlawful acts.

7.7 We maintain a regulatory monitoring system to identify, evaluate and implement requirements applicable

to the business.

7.8 We emphasize that the Anti-Bribery and Anti-Corruption Laws reach not only those who offer or pay, but also those who encourage, enable or participate in the unlawful act.

7.9 We evaluate, at least annually, the effectiveness of internal processes in situations that may constitute evidence of money laundering, bribery, corruption, terrorist financing and financing of the proliferation of weapons of mass destruction, reporting the results to the competent bodies.

7.10 We carry out specific and confidential procedures to identify and prevent risks of fraud, bribery, corruption, AML/LL, FT and FPADM.

7.11 We maintain internal controls and reliable records that allow traceability of decisions and transactions.

7.12 We repudiate any and all forms of discrimination, prejudice or unequal treatment in the work environment or in its institutional relations.

7.13 We maintain a specific channel for receiving and handling complaints, with the option of anonymity, and we encourage their use.

7.14 We treat complaints with confidentiality, impartiality, timeliness and traceability, in accordance with internal regulations.

7.15 We prohibit any form of retaliation, discrimination, or harmful treatment against employees who, in good faith, make reports, report concerns, participate in investigations, provide information or testimony, or who refuse to engage, authorize, or participate in any act of bribery.

7.16 We subject third parties who fail to comply with this Policy to the application of the applicable contractual measures, including warnings, suspension or contractual termination, without prejudice to communication to the competent authorities, when applicable. In addition, we carry out a risk-based approach in the application of controls related to international sanctions, considering local legislation, the nature, complexity and risks of our activities.

7.17 We apply disciplinary measures to employees who fail to comply with this Policy or internal regulations, including warning, suspension and dismissal, without prejudice to other applicable legal measures.

7.18 We have adopted Due Diligence procedures and contractual inspection guidelines aimed at mitigating the risks of AML/AML, bribery, corruption, FT and FPADM.

7.19 We do not conduct business with anonymous persons or those linked to fictitious holders, nor do we initiate or maintain a relationship or carry out financial transactions with persons or entities designated or sanctioned for involvement in terrorism, subject to applicable law.

7.20 We request that suppliers and partners adopt criteria for the integrity and training of their employees, compatible with the principles of this Policy.

7.21 We request that banking correspondents and service providers carry out periodic training in PLD/FT/FPADM, as applicable.

7.22 We adopt integrity criteria applicable to the hiring and conduct of employees and previously carry out the verifications provided for in internal regulations. We adopt measures compatible with the risks identified to initiate, maintain or terminate relationships, when there is evidence of involvement in integrity offenses.

7.23 We condition the identification of Transactions with Related Parties by means of a technical note as part of the evaluation points for the decision-making of the competent authorities.

7.24 We act in accordance with the guidelines of the controlling shareholder (Banco do Brasil) and communicate to the responsible area of the controller and to the competent authorities the operations detected in our monitoring that may characterize AML/PLD, FT, FPADM, bribery or corruption, under the terms of the legislation in force.

7.25 We adopt accounting principles and practices and administrative and financial management in accordance with laws, rules and regulations in force. The financial statements must accurately and clearly reflect BBTS transactions, and incomplete, false records or records that make it difficult to understand the facts are prohibited.

7.26 We act with transparency in the relationship with public entities and prevent LD/AML, bribery, corruption, FT and FPADM practices in business in the country and abroad.

7.27 We prohibit any donation, sponsorship or advantage to an individual or legal entity, public agent or not, as well as to political parties, campaigns or candidates for public office, with the aim of influencing business decisions.

7.28 We prohibit offering, promising, granting, soliciting, demanding, accepting or receiving an undue advantage of any nature (financial or otherwise), directly or indirectly.

7.29 We perform the function of Compliance Officer and Anti-Bribery Officer with independence and autonomy to access information, recommend measures and report, when necessary, directly to the Board of Directors.

7.30 We reinforce the commitment of senior management to the effectiveness and continuous improvement in the application of this policy, procedures and internal controls aimed at preventing money laundering, bribery, corruption, terrorist financing and proliferation of weapons of mass destruction at BBTS.

7.31 We disclose the Compliance and Anti-Bribery Policy both internally and externally, to partners and third-party service providers and other third parties with whom we have a business relationship.

7.32 We collaborate with competent authorities in investigations related to acts harmful to the national and foreign Public Administration arising from our activities, in compliance with the applicable legislation.

8. APPROVAL

8.1 This policy was assessed by the Executive Board on 10/21/2026 and approved by the Board of Directors (Conad) of BBTS, through Technical Note 2026/0489, on 10/26/2026.