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CNPJ 61.532.644/0001-15

A Publicly Listed Company

ITAÚSA'S CODE OF CONDUCT

Message from the Management

We are a Brazilian holding company with over 45 years' worth of experience built on ethics and credibility. These are the values on which we act on to drive Brazil forward in a number of segments, through responsible companies and strong brands that are leaders in their markets. We advise our investees so they can make strategic, financial and social decisions, sharing our culture of governance, valuing people, discipline in capital allocation and focus on creating long-term value.

We endeavor to create sustainable value with a positive impact on society, by developing our actions, investment decisions and relationships with internal and external stakeholders based on integrity, respect and transparency.

Accordingly, we are bringing back our revisited Itaúsa's Code of Conduct, designed to address, with objectivity, transparency and simplicity, the principles, values and commitments that guide our actions and how we relate to society and the market. This document underlines concepts and provides guidelines that contribute to our responsible and ethical operation.

In this revisited version, we reaffirm the trust we have in our employees, management members and business partners to make accurate decisions in the face of ethical dilemmas that may arise in our activities. You will find here guidelines and directions to support you to choose the right pathway to follow.

We count on everyone's commitment to the regular day-to-day compliance with our Itaúsa's Code of Conduct, showcasing our commitment to ethics and integrity, values that are core and non-negotiable for us.

Board of Directors

Board of Officers

1. Objective and Application

Itaúsa's Code of Conduct's objective is to inform our principles and what is the expected conduct of each one of us while carrying out our professional activities and relationships at Itaúsa S.A. ("Itaúsa" or "Company").

We are committed to complying with the legislation, rules and regulations in force, and our policies and internal rules, as well as to acting in an ethical and fair manner.

It is the responsibility of all members of our management, committees and Fiscal Council, as well as employees, including outsourced workers, regardless of hierarchical level and placement, and suppliers and other Company's stakeholders to get to know, care for, respect and comply with the rules and guidelines for this Code of Conduct.

Investee companies should comply with the principles set forth herein.

Itaúsa's Code of Conduct is – and should be – a document for permanent reference both for management members and the employees of our organization. It is essential that everyone should read it carefully, using it to guide their actions and decisions.

Should everyone make the effort to daily and routinely put the Itaúsa's Code of Conduct into practice, we have no doubt that we can build an even stronger and more ethical organization – and a reason for pride on the part of all of us.

Check out Itaúsa's Code of Conduct on the intranet or the Company's website: <https://www.itausa.com.br/> > Corporate Governance > Bylaws and Policies > Code of Conduct.

2. Itaúsa's Identity

Our managing Itaúsa is aimed to have an efficient and sustainable performance based on a fair conduct towards the build-up of positive interactions with our stakeholders.

Itaúsa's culture is defined as a set of ethical values and principles that guide our way forward and drive our conduct over time.

The continued existence of these values and guiding principles inspires our policies and practices and, over time, steers the Company's activities as a whole, thereby building up Itaúsa's identity.

The guidelines on this Code provide tangibility to these intentions and give clarity in guiding Itaúsa's management members and employees towards defining the Company's strategies, policies and practices.

Our activities and business are based on the following principles:

- Ethical values: a distinctive governance culture based on ethical values, risk management and appreciation of human capital.
- Value creation: commitment to sustainable long-term value creation.

- Business: Investment in sustainable business with positive impact on society.
- Portfolio: strategic, financial decision-oriented portfolio management.
- Sustainable: encouraging the adoption of sustainable practices, development of eco-efficient, innovative and technological solutions.

3. Appreciation of Employees

Itaúsa's human capital is recognized for its expertise in business development and management, risk assessment, and compliance with governance practices, business ethics and integrity.

In line with the concept of shared culture, board members, officers, managers and technical teams are continually appreciated, with their professional development encouraged and the build-up of a diverse and friendly internal environment.

We aim to achieve the wellbeing and human and professional development of our employees.

Accordingly, we adopt people management, compensation, training and performance evaluation policies to manage people with respect, transparency and impartiality.

We adopt a number of initiatives that promote the care of employees and carry out actions that encourage their physical and mental health, aimed at their quality of life and well-being.

We provide equal opportunities for access to work and professional advancement through selection, meritocracy and promotion processes with a view to identifying those most suited and skilled for the Company's profile and needs.

We respect the right for collective bargaining and free labor union association. We comply with collective agreements and respect labor rights and duties.

We have zero tolerance for any form of violation of human rights, such as child, forced or compulsory labor.

In order to ensure our stakeholders' good standards of behavior, we encourage our suppliers and service providers to behave in compliance with Itaúsa's Code of Conduct and our commitment to human rights. We require this commitment from our suppliers and service providers to be written down in contract.

3.1. Respect for Diversity

At Itaúsa, we repudiate any and all misconduct in connection with moral and sexual harassment or discrimination based on physical characteristics, health conditions, gender, color, sexuality, ethnicity, age, social class, nationality, beliefs and personal values, among other discriminatory conducts.

Our Company values a workplace where all employees feel respected and included, and we value the care, dialogue and diversity of opinions as tools for professional appreciation and growth.

4. Our Workplace and Internal Conducts

We are a Company committed to values that enable a respectful and pleasant workplace for our employees, as we value the well-being of everyone. We believe that a healthy and motivational workplace is one in which everyone feels at ease and respected and, therefore, it is essential that all activities performed by our employees is pervaded with courtesy, respect, trust and transparency.

Accordingly, we must treat our colleagues as they would expect to be treated, respecting their characteristics and opinions.

We encourage an ethical, fair, transparent, sustainable and prejudice-free workplace.

We do not tolerate any misbehavior in our relationships or any discriminatory conduct, harassment of any nature or activities in violation of current legislation and/or our internal policies.

Any and all activities that violate the guidelines and rules of this Code must be reported via Itaúsa's Whistleblowing Channel or directly to our Compliance and Corporate Risks department.

4.1. Compliance with Laws and Internal Policies

We must comply with all the laws and regulations applicable to the Company, as well as our internal policies and rules, acting with a high degree of integrity at all times.

We have institutional policies and practices to prevent and fight all forms of corruption (bribery, improper favoritism, etc.), money laundering, fraud and other illicit acts.

Corruption

We do not tolerate any form of corruption, in conformity with Federal Law No. 12,846 of August 1, 2013 (Anti-Corruption Law), including, but not limited to, bribery, embezzlement, extortion, illegal agreements and facilitation payments made by our employees or third parties in the conduct of our business, whether in the relationship with Public Officials or with private entities.

Money Laundering

Under no circumstances should businesses and activities be used as a tool for money laundering, that is, no business or financial activity should have the ulterior motive of providing funds from illegal activities, whatever they may be, with the appearance of coming from legitimate sources.

Fraud

The misuse of the Company assets, information and resources is unacceptable and may be considered a type of fraud if any employee intentionally alters, omits, manipulates or falsifies any information or situation to lead to an unfair and/or illegal advantage or disadvantage of any type.

Any suspicion or evidence of such acts must be promptly reported through the Itaúsa Whistleblowing Channel or directly to our Compliance and Corporate Risk department.

Our procedures for preventing any action that may be characterized as corruption are described in the Policy on Relationship with Private Entities and Public Officials and for Prevention of Corruption.

Our Itaúsa Integrity Program consolidates the guidelines adopted with the objective of reinforcing the prevention and correction of irregularities, fraud and corruption, through internal integrity mechanisms and regulations, actions and internal controls, in addition to being signatories of the Corporate Pact for Integrity and Against Corruption.

We promote internally the perception that laws, rules and regulations do not exhaust the ethical implications for all situations. For this reason, we encourage everyone to reflect on how our actions impact our stakeholders, society and the environment from an ethical viewpoint.

4.2. Professional Posture

We expect our employees to be courteous and respectful with their colleagues, clients and business partners at all times.

Our internal relationships, particularly those between supervisors and employees, are based on trust, cooperation and mutual respect, with the adoption of good management practices, such as dialogue and recognition of work, thus avoiding unreasonable or unnecessary job demands or shaming.

Our employees must have the same professional attitude, excellence and commitment to the principles of this Code regardless of where they are allocated or perform their professional duties, that is, whether they are working on an in-person, remote or hybrid basis.

4.3. Company's Assets

All Itaúsa's facilities, materials, goods and equipment, including technology resources such as computers, laptops, tablets and mobiles, must be used with care, responsibility and be directed towards the performance of professional duties and comply with Itaúsa's internal policies.

Even though we understand the need for the limited use of these tools for personal purposes, the Company's technology resources for such purposes must be used in a responsible and reasonable way, subject to the regulations and processes approved by the Company and the information security mechanisms, to ensure data confidentiality and privacy and avoid damage to the activities performed by the employee.

All technology resources, goods and equipment made available are subject to monitoring, that is, emails, computers, laptops, tablets and mobiles owned by Itaúsa can be monitored at any time, at the Company's discretion, with no prior notice to employees.

We should use email, the Internet, telephones and other resources in a professional manner, as well as make use of proper, respectful language with no defamatory words.

We must not use our technology resources for playing games, chain messages, exchange or storage content in disagreement with Itaúsa's ethical principles, such as improper content, as in websites with adult or illegal, discriminatory, or defamatory content, or for spreading messages or files with chain messages, rumors, fake news, or that disrespect any individual or entity or are contrary to Itaúsa's regulations and legislation in force.

We must respect the third party's copyright and intellectual property rights.

Accordingly, we will not tolerate the use and sharing of unauthorized copies or copies obtained illegally of third party materials, systems and software. We are only allowed only to install, use or permit the use of software programs licensed to the Company.

5. External Conduct on Behalf of Itaúsa

We endeavor to establish effective bonds with our stakeholders.

To this end, we encourage dialogue and cooperation, welcome their suggestions and criticisms to enhance our performance, and respond expeditiously and accurately to any questions they may have.

This is the only way to achieve the credibility required to advance the Company's business.

We believe that a shared value is beneficial to all parties involved, resulting in the sustainability of relationships.

5.1. Stockholders and Investors

We provide accountability on a timely and accurate basis, and our representations, reports, announcements and statements reflect the reality of the Company with transparency and consistency.

One of our commitments is to disclose information of interest to stockholders and investors in compliance with legal and regulatory provisions, in a transparent and ethical manner to avoid it is used for our own benefit or that of third parties. Therefore, we must not use actual or prospective business opportunities that have been identified by the Company to our personal advantage.

In addition to mandatory disclosures, we aim to keep our stakeholders and society informed about the Company's initiatives and strategies.

In order to preserve the interests of stockholders and investors, we have adopted processes to manage risks, compliance, internal controls, including financial and accounting, auditing and information security, aimed to monitor the compliance with the rules and legislation in force, focusing on the sustainability of Itaúsa's business.

We adopt proven corporate governance practices and run Itaúsa with diligence, fairness, transparency and caution.

Ultimately, we respect stockholders' and investors' personal data, protecting their privacy and keeping their information confidential; otherwise we will jeopardize the trust we have gained.

5.2. Suppliers, Service Providers and Business Partners

We adopt technical, objective, impartial, transparent and fair selection and engagement criteria for aimed at not to give rise to suspicion of undue favoritism of any type and to thus discredit existing partnerships.

We build up relationships based on professionalism and mutual respect with all our suppliers, service providers and business and commercial partners.

We encourage our suppliers and service providers to adopt sustainable development practices and require compliance with legal standards, including labor, environmental, and personal data protection and security, with special emphasis on combating illicit or criminal acts (corruption, influence peddling, fraud, money laundering, contraband, among others).

While rendering services to Itaúsa, we require that service providers instruct their employees to comply with the guidelines of Itaúsa's Code of Conduct and all applicable legislation.

5.3. Relationships with Private Entities and Public Officials

Itaúsa has the commitment to interacting with public officials in an ethical, moral, fair, professional, transparent way, in full compliance with Anti-Corruption Laws¹.

The relationship and interaction with any public officials and private entities should be based on the best market practices, respecting the rules that govern the public administration, legislation and the applicable regulations as well as the guiding principles set forth in Itaúsa's Code of Conduct.

The Company does not make donations to political parties or candidates for public office.

5.4. Social Media and Instant Messaging Apps

The Internet, social media and instant messaging apps have changed how we work by offering new ways to engage and communicate with employees, business partners, and the world at large.

All Itaúsa's employees are responsible for promoting and upholding the Company's reputation in all forms of communication. We know that actions in the virtual world affect the real world and therefore we must care for the responsible use of social media by avoiding disrespectful, discriminatory approaches or approaches that can generate a dubious or controversial interpretation, which can affect both the employee's and Itaúsa's image.

Be ensure that any comments you make are consistent with your work and our Company's values and professional standards. Please also bear in mind that your profile may be being

¹ It refers to Federal Law No. 12,846/13, as regulated by Federal Decree No. 8,420/2015 and, as applicable, Law No. 8,429/1992 (Law against Misconduct on Public Office) and Law No. 8,666/1993 (Procurement Regulation Law).

viewed not only by your colleagues, but also by our business partners and stockholders. By being careful you will be protecting the Company and your personal image.

Among other conducts, we highlight the following guidelines for good use and behavior in social media and messaging applications, either inside or outside the workplace:

- Do not share messages you receive in your corporate email and that include in-company-related content with people outside the Company;
- Do not post images or comments that may unveil confidential or privileged information about Itaúsa or our investees;
- Do not disclose information or spread rumors or fake news that may tarnish the image and reputation of colleagues and other people related to Itaúsa and its investees, such as management members, clients or competitors;
- Do not create profiles on behalf of Itaúsa. You can talk about the company as long as this information is in public domain and specifically about your performance in the Company, but not on behalf of Itaúsa.

5.5. External Communication

Market

Contact the Investor Relations department whenever a request for communication from stockholders or investors arises. The IR department is prepared to communicate in an accurate, transparent and timely manner, allowing stockholders and investors to monitor the Company's activities and performance.

Press

We base our relationship with the press on transparency and respect. We have a relationship with the media based on impartiality and truthful, clear and proper information, aimed to help media outlets to fulfill their role of judiciously informing public opinion.

To ensure we have adequate communications with the media, we highlight the following guidelines:

- Whenever you are contacted by the press, refer the matter in hand to the Corporate Communications area, which will handle requests in accordance with applicable policies;
- Never disclose information and/or give interviews without the prior authorization of the Corporate Communications department. In addition to being prohibited by the Company's policies, improper communications can result in serious damage to Itaúsa's reputation and image;
- Advise your suppliers not to disclose any project carried out alongside the Company or that is in progress. No service provider is authorized to speak about Itaúsa's projects without the prior authorization of the Communication department and the contracting department;
- Whenever you identify a piece of fake news or inaccurate information published that affects Itaúsa's image, please promptly inform it to the Communication department;

- We must not disclose any information about or on behalf of the Company or its employees, through personal talks, telephone calls, email or social networks, in order to promote press news, influencers or opinion makers, without proper alignment with the Corporate Communications department, as such situations may pose a risk to our image and reputation and possibly be misunderstood by our stakeholders.

5.6 Political and religious viewpoints and affiliation

Everyone is entitled to free political association and religious beliefs. However, as employees of the Company, we represent Itaúsa and certain measures must be carefully carried out.

We do not allow the Company's corporate communication channels, premises and assets to be used to promote an employee's own candidacy or the candidacy of third parties or any political or religious movement.

We respect the expression of opinions and the political participation of management members and employees on a strictly personal basis, provided that these practices are not construed as representing Itaúsa's stance or constitute a disguised form of institutional support.

5.7. Clients

We understand the importance of the ongoing identification of clients' and consumers' needs and expectations.

Both clients' and consumers' freedom of choice should be respected by providing them with the required information in a clear, accurate and timely manner, so they are able to make sound decisions and are not misled to make mistakes.

Clients and consumers must be served expeditiously, with hospitality and professionalism, and have their interests, time and opinions valued.

Clients' and consumers' privacy should be valued, with the use of data security and protection devices in place to ensure that this data is only used to their own benefit and with their consent.

5.8. Competitors

We operate in conformity with competition law and respect our competitors' reputation and opinions.

We are members of business associations in a spirit of cooperation to improve the sectors of the economy in which we operate, and we repudiate any type of agreement or exchange of information which jeopardize free competition.

We respect intellectual property rights and we never use information from competitors without their express authorization.

6. Conflicts of interest

We should avoid situations in which our personal interests may be conflicting, or appear conflicting, with the interests of the Company or any company in Itaúsa's portfolio.

As a general rule, a conflict of interests consists of a situation in which our position or responsibilities at Itaúsa gives rise to an opportunity for us (or someone close to us) to obtain personal gain or benefits (as distinct from work-related compensation) or where an opportunity arises to favor our personal interests (or those of persons close to us), putting them before our duties and responsibilities to the Company or the companies in Itaúsa's portfolio.

In these cases, the impartiality of our actions may be compromised, posing a risk to the reputation and integrity of Itaúsa, its management members and employees.

Typical examples of conflicts of interest may include as follows:

- Concurrent professional activities: have another occupation aside their functions at Itaúsa that negatively affects their performance or interferes with their functions as a Company's employee.
- Working relationships and affective or kinship bonds: participation in the selection and hiring process involving a relative to be hired as an employee or supplier of Itaúsa.
- Relationship with Public Officials: obtain improper advantage for the Company due to affective relationships or kinship with people working at public bodies.

In order to refrain from abusing the prerogatives of our position and prevent practices that may result in private benefits or improper advantages to third parties, in the event of any conflicts of interest or other situation not set forth in Itaúsa's Code of Conduct or its internal policies, please refer to the Company's Compliance and Corporate Risk department or Itaúsa's Whistleblowing Channel. Please refer to our internal policies for further information on our procedures to prevent any action that may be characterized as a conflict of interests.

6.1 Gifts and Hospitality

Exchanging gifts and hospitality is part of the business world. However, this practice must be carried out with caution, since it can give rise to awkward situations and affect our relationships of trust.

Gifts and hospitality should be fair and worth a reasonable value (that is, they cannot be excessive in the circumstances and must comply with the thresholds and frequency defined in the Company's internal policies), as well as having a legitimate business purpose. •Under no circumstances should giving or accepting gifts/hospitality have the intention or appear to influence any type of decision-making by the Company and/or our business partners.

For further information on gift-receiving and giving and hospitality, please refer to our related internal policies.

6.2. Related Parties

Itaúsa's organizational structure is defined as a function of the greater interests of the Company and never as a function of personal interests of stockholders, management members or third

parties. We adopt corporate governance practices that mitigate conflicts of interest between our management members and Itaúsa's stockholders and investors.

Itaúsa's transactions with related parties should reflect their arm's length and transparent nature, ensuring stockholders, investors and other stakeholders that such transactions are based on the best corporate governance practices.

Accordingly, we should follow and comply with internal guidelines governing related-party transactions, in particular our own Policy for Transactions with Related Parties, approved by the Company's Board of Directors.

7. Confidentiality of Information and Personal Data Protection

How we use available information and know-how (knowledge, techniques, technology, methods, systems, software, among others) can result in positive or negative outcomes, as this use impacts both business and people's reputation. Therefore, the secrecy of confidential and privileged information is very important both in the professional as well as in the personal context.

7.1. Use of Confidential Information

We protect information not yet in the public domain (such as financial data and earnings not yet disclosed, confidential corporate information and personal data) to avoid its leakage to jeopardize Itaúsa, our stakeholders and society in general, as well as the relationships of trust between us and these audiences.

Therefore, it is important to be cautious when handling information, in particular:

- Be diligent with confidential information and do not disclose or share it with colleagues or third parties who do not need it for performing their activities;
- Ensure the confidentiality of information, including at meetings with business partners, associations and benchmarking work and other public places;
- Restrict discussing matters relevant to the Company to the workplace. Do not talk about the Company's projects in public places, such as elevators, airplanes, restaurants or bars;
- Deal with strategic or non-public matters of the Company only through technology resources approved by the Company.

Therefore, we cannot use information not yet in the public domain for private ends, nor can we pass it on to third parties, whether by professional email or otherwise, without prior authorization, even after leaving the Company.

7.2. Use of Privileged Information

We are a listed company with shares and other securities traded in capital markets. We are therefore subject to inspection from regulators and must protect the use of Privileged

Information².

The procedures for preventing the use of Privileged Information are set forth in the Company's Policy for Trading Company Securities and the Policy on the Disclosure of Material Information, both of which must be signed up by all the Company's employees and management members. These policies can be accessed on the Company's website (<http://www.itausa.com.br/> > Corporate Governance > Bylaws and Policies > Policy for Trading Company Securities and > Policy on the Disclosure of Material Information).

Procedures to avoid the improper use of Privileged Information include among others: (i) setting blackout periods for trading securities issued by the Company and its controlled companies (as, for example, from the date of acknowledgment to the date of disclosure of material information to the market, inclusive); (ii) duty of confidentiality of information related to the material information of the Company and its controlled companies; and (iii) under specific conditions, informing the Company on the ownership and trading of securities issued by the Company or its publicly-held controlled or parent companies.

We repudiate the use of Privileged Information for the benefit of employees, management members or third parties with which the Company relates, by barring its use for external purposes or the recommendation of investments to family members, friends or any stakeholder or otherwise obtain improper advantage in stock markets.

7.3. Personal Data Protection

It is the responsibility of everyone to ensure the protection of personal data, whether of employees, stockholders, investors, customers, suppliers or any third parties.

We are committed to complying with national laws and regulations on privacy and personal data protection, including the General Data Protection Law (LGPD). Accordingly, we comply with the following data protection and privacy requirements:

- respect for privacy.
- respect for people's rights over their data.
- the inviolability of intimacy, honor and image.

8. Corporate Responsibility

Itaúsa operates through a shared culture as a driver of good practices and environmental and social (E&S) actions and improvements in the governance of the Company itself and its investees.

We therefore value and encourage the ongoing improvement of governance, in addition to E&S development, either through the support for social projects and/or internal volunteering

² All information relating directly or indirectly to the Company and portfolio companies that may influence in a significant way: (i) the quotation of securities of its issuance traded in the market; (ii) the investors' decision to buy, sell or hold said securities; or (iii) the investors' decision to exercise any inherent rights as holders of securities issued by the Company and portfolio companies or indexed thereto, in accordance with the law and still not in the public domain.

campaigns.

Donations and sponsorships made by Itaúsa must respect the principles of ethics, transparency and good faith, as well as comply with applicable laws and the Company's internal policies, levels of authority and procedures. Donation and sponsorship recipients must be duly regularized and proven to be legitimate and reputable.

Donations or sponsorships made directly to Public Officials are forbidden.

We encourage employees to engage in volunteering through their involvement in social actions promoted by the Company.

9. Management of Itaúsa's Code of Conduct

9.1. Training

Education and communication actions in connection with the guidelines of Itaúsa's Code of Conduct and the several policies adopted by Itaúsa that are a part of its integrity program, setting out clear standards of conduct and being in line with the Company's values, contribute for management members and employees to:

- increase their knowledge of integrity and ethics guidelines and their application to business and the management of processes and people; and
- be trained to identify, prevent and solve ethical dilemmas, conflicts of interest and misconduct.

Itaúsa's education and communication practices cover, as follows:

- Education: training initiatives for all members of management and of the Fiscal Council, as well as employees when joining the Company and whenever Itaúsa's Code of Conduct is amended, as a way to engage the entire Company to adopt the principles of the standards of conduct set forth in the Code. Ethics and integrity related events are also held.
- Communication: awareness-raising campaigns, announcements on specific ethics-related topics, and disclosure of policies and guidelines.

9.2. Adherence

All members of management and the Fiscal Council, as well as employees, acknowledge their awareness and agreement with Itaúsa's Code of Conduct when they join the Company.

Additionally, every member of management, Fiscal Council and employee of the Company renew their commitment to Itaúsa's Code of Conduct every year. Renewing the commitment to Itaúsa's Code of Conduct is also required whenever the provisions herein are amended.

The adherence of our suppliers, service providers and business partners to Itaúsa's Code of Conduct must be written down in contract.

9.3 Sanctions

Failure to comply with Itaúsa's Code of Conduct, as well as any complaints or charges reported in bad faith, are subject to sanctions as set forth in the Company's internal policies.

For Itaúsa's suppliers and/or stakeholders, illegal conducts or conducts that breaches Itaúsa's Code of Conduct will characterize breach of contract, subject to termination and other penalties set forth in the corresponding contract.

9.4. Itaúsa's Whistleblowing Channel

The Company has its own Itaúsa's Whistleblowing Channel, an independent and unbiased tool, through which employees, management members and third parties related to Itaúsa may report claims, request guidance on how to act in certain situations, submit questions for clarification, criticisms, complaints, and any misconduct, violations and conflicts of interest, at all times in a safe, professional, unbiased and confidential way, without fears of retaliation or reprisals.

Complaints may be reported in an identified, confidential or anonymous way.

9.5 Duty to Report and Content of Reports

Employees and members of management and the Fiscal Council have the duty to report any actual or suspected breach of this Itaúsa's Code of Conduct and/or the laws in force, including when carried out by third parties providing services to the Company.

We must also notify our supervisor and/or Itaúsa's Whistleblowing Channel whenever we become aware of any situation that represents, or may come to represent, a conflict of interests.

Claims reported must be supported with the most comprehensive information possible, such as: (i) an objective and unbiased description of the event; (ii) where and when the violation occurred or is occurring; (iii) the persons and organizations involved; and (iv) any documentation to help assess the event and take any required actions.

We do not tolerate any type of retaliation or reprisals against those who voice legitimate concerns in good faith. In addition to guaranteed confidentiality, it is important to underline that any retaliation or reprisal arising from a claim reported is construed as a breach of Itaúsa's Code of Conduct, subject to sanctions in accordance with applicable legislation.

Groundless reports or charges will be disregarded.

9.6 Contact with Itaúsa's Whistleblowing Channel

Employees, members of management and of committees and the Fiscal Council, as well as third parties, may contact Itaúsa's Whistleblowing Channel via the channels below, including on an anonymous and confidential basis.

By phone: (+ 55 11) 0800 721 9574

Email: denunciasitausa@deloitte.com

Internet: <http://www.ethicsdeloitte.com.br/itausa/>

9.7 Personnel and Ethics Council

Among other responsibilities, it is incumbent on the Personnel and Ethics Commission to:

- (i) implement and spread this Itaúsa's Code of Conduct across the organization;
- (ii) promote training and disclosure and awareness-raising campaigns to be carried out by the Compliance and Corporate Risk department;
- (iii) periodically revise and update the Itaúsa's Code of Conduct;
- (iv) investigate any breaches of Itaúsa's Code of Conduct, including those reported through Itaúsa's Whistleblowing Channel or otherwise; and
- (v) propose, as applicable, any corrective actions, except in cases involving the members of the Council itself, the Board of Officers or the Board of Directors of the Company, which should then be reviewed by the Company's Board of Directors.

APPROVAL OF ITAÚSA'S CODE OF CONDUCT

This document was approved by the Board of Directors on August 8, 2022 and revokes the previous version of the Itaúsa's Code of Conduct.

The policies mentioned throughout this document, as well as other current policies, are available at: <https://www.itausa.com.br/> > Corporate Governance > Bylaws and Policies.
