

POLICY FOR TRADING COMPANY SECURITIES

(approved by the Meeting of the Board of Directors held on 07.31.2002 and amended on 05.09.2005, 05.08.2006, 03.01.2010, 12.19.2011, 05.07.2012, 08.11.2015, 02.19.2018, 11.12.2018 and 02.18.2019)

1. GENERAL PRINCIPLES

Scope

- 1.1. The Policy for Trading Company Securities (POLICY) sets guidelines and procedures to be followed by Itaúsa S.A. ("Company") and by the persons bound to it, pursuant to the provision in subitem 2.1 for trading securities issued by the Company and its controlled companies or indexed to the same and for the disclosure of the information with respect to item 6 below, as per the Brazilian Securities and Exchange Commission ("CVM") Instruction 358, dated January 3, 2002, as amended.

Management of the POLICY

- 1.2. The general management of the **POLICY** is incumbent on the Investor Relations Officer.

Disclosure and Trading Committee

- 1.3. The Disclosure and Trading Committee is chaired by the Investor Relations Officer and comprises from 2 (two) to 10 (ten) persons selected annually by the Board of Directors from the members of the Board of Directors itself and the executive officers of the Company and from the controlled companies, and shall meet upon convening by the Investor Relations Officer.
 - 1.3.1 It is the responsibility of the Disclosure and Trading Committee in relation to the POLICY:
 - a) to counsel the Investor Relations Officer;
 - b) to review it, recommending to the Board of Directors any appropriate alterations;
 - c) to decide on any eventual questions regarding the interpretation of its wording;
 - d) to take all necessary measures for the disclosure and circulation thereof, including to the Company's employees;
 - e) to investigate and decide upon cases of violation pursuant to item 9, submitting any such violations to the cognizance of the Board of Directors, pursuant to the provision on subitem 9.1.2;
 - f) to analyze the contents of replies to any official enquiries from regulatory and self-regulatory entities; and
 - g) to propose solutions for any cases of omission or exceptions.
- 1.4. The concept of a security for the purposes of this POLICY shall include, without limitation, common or preferred shares, units in investment funds or clubs, the bylaws of which require that their equity portfolio be made up exclusively of shares issued by the Company, its controlled companies or its controlling Company, debentures, commercial papers and promissory notes, subscription bonuses, subscription warrants and rights, futures contracts, options, and other derivatives indexed to any of these securities.

2. PERSONS BOUND BY THE POLICY

List of Persons Bound by the POLICY

2.1. The following are denominated Bound Persons, subject to the POLICY:

- a) the directly or indirectly controlling stockholders with exclusive or shared control, officers, members of the Board of Directors, of the Fiscal Council and of any organs with technical or advisory functions that may have been created in compliance with the Company's bylaws;
- b) the members of the statutory organs of controlled companies in which the Company is the sole controller, should the company to which they were elected lack a securities trading policy of its own (subitem 8.1);
- c) any person who, by virtue of their function or position in the Company, its controlling stockholder, its controlled companies or affiliates, may have cognizance of a material act or fact;
- d) the spouse (from whom the Bound Person is not judicially or extrajudicially separated) or partner or any other dependent included in the annual income adjustment tax returns of the persons referred to in letters "a" and "b" including for a duration of 6 (six) months after these persons leave the Company; and
- e) the persons mentioned in letters "a", "b" and "c" of this subitem who leave the controlling company, its controlled and affiliate companies for the duration of 6 (six) months as from the date of leaving.

2.1.1. Bound Persons also include:

- a) the managers of portfolio and investment funds, corporations or other institutions or entities of which the Bound Persons may be the sole unit holders or stockholders or in the trading decisions of which such persons may be able to exert influence;
- b) any corporate entity directly or indirectly controlled by the Bound Persons pursuant to the provision in subitem 8.1.1 below; and
- c) any person that may have had access to information regarding any material act or fact through intermediary or otherwise of any Bound Persons.

3. RESTRICTIONS ON TRADING

Restrictions on trading prior to and subsequent to the disclosure of a material act or fact

3.1. The Company and the Bound Persons may not trade securities issued by the Company and its controlled companies or securities indexed to the same from the date that a material act or fact becomes known to the date of its disclosure, inclusive, to the market.

3.1.1. The restriction in subitem 3.1 applies also to those that have a commercial and professional relationship or one of trust with the company, such as independent auditors, securities' analysts, consultants and institutions part of the distribution system, on which it is incumbent to verify disclosure of information prior to trading in securities issued by the Company or instruments indexed to them, as required under the regulations of the CVM.

3.1.2. The Investor Relations Officer may decide to extend the restriction referred to in subitems 3.1 and 3.1.1, beyond the date the material act or fact is disclosed to the market, if, in his judgment, such trading of the securities could prove harmful to the Company or its stockholders.

Exceptional periods when trading is restricted

- 3.2. The Investor Relations Officer may, regardless of any justification or the existence of any yet undisclosed material act or fact, determine periods during which the Company and the Bound Persons may not trade in securities issued by the Company and its controlled companies or securities indexed to the same. The Bound Persons must maintain confidentiality during such periods, pursuant to the Company's Policy for Disclosure of Material Information.
- 3.2.1. The Investor Relations Officer may recommend exceptional periods when there are restrictions on the trading involving Individual Investment Plans pursuant to subitem 4.1.

Other possible trading restrictions

- 3.3. The following shall also be restricted:
- 3.3.1. The persons mentioned in letters "a" and "b" of subitem 2.1 may also not trade in the following situations:
- a) if the said persons have not stated an intention with Itaú Corretora de Valores S.A. to trade securities issued by the Company and its controlled companies or indexed to the same by 10:30 a.m. of the same day on which the trade is intended to be executed. In this case, the Company, or any of its controlled companies, affiliates or other corporations under common control shall be able to trade shares held in treasury for holding or replacement.
 - b) if the said persons have traded securities issued by the Company and its controlled companies or indexed to the same for up to three days, or 60% of the working days, of the same week. This restriction shall not apply if the Company, its controlled companies, affiliates or other entities under common control do not trade shares in treasury (for holding or replacement) in the respective period; and
 - c) on the day when the treasury of the Company, its controlled companies, affiliates or other entities under common control trade securities issued by the Company as a consequence of economic crises or developments implying high price volatility and/or low market liquidity, or at the order of their respective Investor Relations Officers.
- 3.4. Bound Persons may not acquire or sell securities issued by the Company or indexed to the same prior to 180 (one hundred and eighty) days, respectively, from the latest sale or acquisition of securities on a stock exchange or an over-the-counter market.
- 3.4.1. The Investor Relations Officer may, exceptionally and after consulting with the Disclosure and Trading Committee and, in specific cases, reduce this period, albeit continuing to comply with the provision in subitems 3.9 and 3.10.
- 3.5. The Bound Persons may not trade whenever there exists the intention of implementing the incorporation, partial or total spin-off, merger or corporate reorganization of the Company.
- 3.6. The Bound Persons may not lend shares or any other security issued by the Company, or indexed to it.
- 3.7. The Bound Persons may not undertake operations of any nature with call or put options of shares issued by the Company and its controlled companies, the sale of shares issued by the Company in the Forward Market and the trading of shares issued by the Company in the Futures Market.
- 3.8. The Bound Persons may not trade in the period between the decision by the appropriate corporate organ to increase the capital stock, distribute dividends, bonus shares or assets indexed to them, approve a stock split or reverse stock split, share subscription, and the publication of the respective notices or announcement.

Restrictions on trading prior or posterior to the disclosure of the financial statements of the Company

- 3.9. The restrictions from trading also apply to: a period of 15 (fifteen) days prior to: (i) the disclosure of quarterly (ITR) and annual (DPF) financial information of the Company; or (ii) the publication of the notice placing the same at the disposal of stockholders according to the current annual corporate events calendar (Attachment A).
- 3.9.1 The restriction on trading also applies on the day following (i) the disclosure of the quarterly (ITR) and annual (DFP) information reports of the Company, or (ii) the publication of the notice which places them at the disposal of the shareholders, pursuant to the annual corporate events calendar for the respective year (Attachment A).
- 3.9.2. In the event that the Company discloses preliminary financial information or makes advance disclosure of such information, the restriction on trading will cease to be in effect on the following day from that of the disclosure.

Restrictions on trades by the Company itself

- 3.10. The Company may not acquire shares for holding in Treasury in the circumstances referred to in subitems 3.1, 3.2 and 3.9.
- 3.10.1. The Board of Directors of the Company may also not decide to acquire or sell shares issued by the Company itself should any agreement or contract have been reached or signed for the transfer of shareholding control of the Company, or should any option or mandate for the same have been granted, or should the intention exist of entering into an incorporation, a total or partial spin-off, a merger or a corporate reorganization of the Company and while the transaction is not in the public domain through the disclosure of a material act or fact.

Cases where trades are authorized

- 3.11. The restrictions contained in this **POLICY** do not apply, except in the case of the restriction in subitem 3.9:
- 3.11.1. to the acquisition of shares held in treasury by means of a private trade through the exercising of options within the scope of a stock option program, and in the granting of shares under the programs for compensation in shares, both authorized by a stockholders' meeting;
- 3.11.2. to the exercising of preemptive rights of subscription, relating to previously acquired shares;
- 3.11.3. to the sale of securities resulting from the exercising of preemptive subscription rights, conditional on the securities that gave rise to the right having been held in portfolio for a minimum of 180 days; and
- 3.11.4. trades executed within the scope of the Dividends Reinvestment Program.

4. INDIVIDUAL INVESTMENT PLAN

- 4.1. The persons mentioned in letters "a", "b", "c" and "e" of subitem 2.1 may have a single individual investment plan ("Individual Investment Plan") by means of which trades will be permitted during the periods set forth in subitems 3.1, 3.3, 3.4 and 3.5, contingent on the Individual Investment Plan:
- 4.1.1. having a duration of at least six (6) months and is formalized in writing with the Investor Relations Officer prior to the execution of any trades;
- 4.1.2. irrevocably and irredeemably setting the dates and amounts or quantities of the trades to be executed; and

- 4.1.3. entailing a minimum period of six (6) months for the Plan itself, its eventual modifications and cancellation produce effects.
- 4.2. The Individual Investment Plan may allow trading in the period set forth in subitem 3.9 provided that, in addition to compliance with the provision in subitems 4.1.1. to 4.1.3:
 - 4.2.1. the Company has approved a schedule of specific dates for the disclosure of ITR and DFP forms; and
 - 4.2.2. the participant is obliged to revert to the Company any losses avoided or gains recorded on trades with shares issued by the Company due to eventual changes in the dates of disclosure of the ITR and DFP forms, ascertained by means of reasonable criteria set forth in the Individual Investment Plan itself.
- 4.3. The Investor Relations Officer shall evaluate and comment as to the applicability of the Individual Investment Plan in relation to the current regulations, at his discretion, refusing its filing with the Company should this be in disaccord with the POLICY or the current legislation.
- 4.4. The Company's corporate affairs area shall file and keep a specific and individualized control of all Individual Investment Plans of the persons mentioned in letters "a", "b" and "d" of subitem 2.1 and the compliance area shall do so for the persons mentioned in item 2.1 "c". Both areas shall report to the Investor Relations Officer any cases of deviation from the same.
- 4.5. At least once every semester, the Board of Directors shall verify compliance of the trades executed under the Individual Investment Plan.
- 4.6. Cancellation of the Individual Investment Plan shall take place through notification from the participant, or through failure to comply with its terms. In both cases, a new proposed Individual Investment Plan may be submitted after 6 (six) months from the date of notification or of non-compliance, as applicable.
 - 4.6.1. The Disclosure and Trading Committee shall request clarifications from the participant in the event of noncompliance as well as requesting further clarifications on the Individual Investment Plan.
- 4.7. Through the corporate affairs area, the Company shall submit the Individual Investment Plan when required by the regulatory and self-regulatory organs of the markets where the Company's securities have been authorized to trade.
- 4.8. Participants are not permitted to execute any operations that annul or mitigate the economic effects of the operations pursuant to the Individual Investment Plan.

5. DUTIES OF BOUND PERSONS

- 5.1. In addition to observing the restrictions on trading, Bound Persons must:
 - 5.1.1. maintain confidentiality regarding information concerning material acts or facts of the Company and its controlled companies and refrain from using the same to their own advantage or to that of any third party in the securities' markets, and make every effort to ensure that subordinates and third parties also maintain the confidentiality of such information and do not use it for their own purposes, being accountable jointly and severally with such subordinates and third parties in the event of non-compliance; and
 - 5.1.2. use exclusively the Itaú Corretora de Valores S.A. for the trading of the securities under this POLICY, the broker have a blocking system to avoid trading in restricted periods mentioned in subitem 3.9. To this end, open positions involving securities issued by the Company that such Bound Persons may possess with other securities brokers must be transferred to the Itaú Corretora de Valores S.A. within a maximum period of 60 (sixty) days from the date of adherence to this POLICY.

- 5.1.3 exclusively for the bound persons listed in letters (a) and (b) of subitem 2.1, to notify the area for corporate affairs should there be any changes in the information on their spouse or partner from who they are not judicially or extrajudicially separated and any other dependent included in their income tax return within fifteen (15) days from the date of the change.

6. DISCLOSURE OF INFORMATION ON ACQUISITIONS OR SALE OF MATERIAL SHAREHOLDINGS AND TRADING ACTIVITY OF CONTROLLERS AND STOCKHOLDERS

Purpose

- 6.1. Any corporate entity or natural person, or group of persons, acting jointly and severally or representing a common interest, that executed significant trades as per subitem 6.1.1, shall submit to the Company, which, in turn, shall forward the same to the CVM, B3, and to any other stock exchanges or organized over-the-counter markets in which the Company's securities are eligible to trade, a declaration containing the information as required in Attachment B to this POLICY.
- 6.1.1. A significant trade shall be a trade or a group of trades by means of which the direct or indirect stake of the foregoing persons surpasses or drops below 5% (five percent), 10% (ten percent), 15% (fifteen percent), and so on successively, of the type or class of share representing the capital stock of the Company.
- 6.1.2. The obligations referred to in subitems 6.1. and 6.1.1. shall also apply to the acquisition of any rights over the shares and other securities and financial derivative instruments indexed to such shares, still without a date for physical settlement.
- 6.1.3. In cases where the acquisition results in, or shall have been effected with the intention of, altering the Company's stockholder composition or its management structure, as well as in those cases where such an acquisition triggers the obligation to make a public offer, pursuant to the applicable regulations, the acquiring party must cause a notice to be published, at least through the same channels of communication habitually used by the Company, containing the information required in Attachment B of the POLICY.
- 6.1.4. The referred notifications in this item 6 should be made immediately after the realization of the events mentioned herein to the corporate affairs area. In this case the Reference Form shall be updated within 7 (seven) business days as from the date of occurrence.

7. ADHERENCE TO THE POLICY

Form of adherence and the responsible organ

- 7.1. The Bound Persons should adhere to this POLICY by signing a specific instrument in Attachment c, at the time of hiring, election, promotion or transfer, in which they declare that they are cognizant of all the terms of the POLICY and that they undertake to fully comply with them.
- 7.1.1. Bound Persons mentioned in subitem 2.1."c" shall be appointed by their respective executives holding the rank of at least officer and adherence shall be the responsibility of the compliance area, which shall annually renew the adherence process.
- 7.1.2. Adherence of the persons mentioned under letters "a", "b" and "d" of subitem 2.1 shall be the responsibility of the corporate affairs area, which shall annually renew the adherence process.
- 7.1.3. The Company and the Bound Persons as defined herein, shall comply with this POLICY and shall declare their cognizance and adherence to the terms of this POLICY pursuant to Attachment C, eventual omission in the declaration of cognizance and adherence not exempting the Bound Persons from the duty of complying with the said terms.

8. PUBLICLY TRADED CONTROLLED COMPANIES

Trading Policy of the controlled companies

- 8.1. Publicly traded controlled companies:
- 8.1.1 that have their own securities trading policies shall not be required to adhere to this POLICY. In this case, the rules provided in such a policy shall apply to the publicly traded Company and its controlled companies.
 - 8.1.2. that do not have their own securities trading policy shall adhere to this POLICY. In this case, the present POLICY's rules shall apply to publicly listed companies and their controlled companies. Once adherence has been completed, the terms contained in this POLICY shall be considered as being the trading POLICY of these companies, pursuant to CVM Instruction 358 of January 3, 2002.

9. POLICY VIOLATIONS

Sanctions

- 9.1. Failure to comply with this POLICY shall render the offender subject to disciplinary sanctions, according to the Company's internal norms and pursuant to those contained in this item, independently of any applicable administrative, civil or criminal sanctions.
- 9.1.1. It shall be incumbent on the Disclosure and Trading Committee, through the corporate affairs and compliance areas, to monitor executed trades and examine cases of POLICY violations, notwithstanding the following:
- a) the Bound Persons referred to in letters "a" and "b" of subitem 2.1 shall be liable to sanctions decided by the Company's Board of Directors, following investigation and referral to the Disclosure and Trading Committee; and
 - b) the persons referred to in letter "c" of subitem 2.1 shall be subject to sanctions of a warning, suspension or termination for just cause, according to the gravity of the violation. The sanctions under this letter "b" shall be decided by the Investor Relations Officer and subsequently reported to the Disclosure and Trading Committee.
- 9.1.2. The Disclosure and Trading Committee shall report violations to the Board of Directors in accordance with their gravity.

Reporting a violation

- 10.2. Any person who adheres to the POLICY and is cognizant of its violation must immediately report the fact to the Disclosure and Trading Committee.
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**ITAÚSA S.A.
POLICY FOR TRADING COMPANY SECURITIES**

ATTACHMENT A

2021 CALENDAR

The schedule below sets forth the blackout periods for trading the securities or any other financial instrument related to the securities, as a result of periodic events (DFP and ITR)

Issuing Companies	Periodic Events	Blackout Trading Periods (day. month. year)	Date of Release of Results
ITAÚSA	Financial Statements/DFP December 31, 2020	from 01.17.2021 to 02.23.2021	02.22.2021
	ITR – 1 st Quarter/2021	from 04.18.2021 to 05.11.2020	05.10.2021
	ITR – 2 nd Quarter/2021	from 07.18.2021 to 08.10.2021	08.09.2021
	ITR – 3 rd Quarter/2021	from 10.19.2021 to 11.09.2021	11.08.2021
ITAÚ UNIBANCO	Financial Statements/DFP December 31, 2020	from 01.17.2021 to 02.02.2021	02.01.2021
	ITR – 1 st Quarter/2021	from 04.18.2021 to 05.04.2021	05.03.2021
	ITR – 2 nd Quarter/2021	from 07.18.2021 to 08.03.2021	08.02.2021
	ITR – 3 rd Quarter/2021	from 10.19.2021 to 11.04.2021	11.03.2021
ALPARGATAS	Financial Statements/DFP December 31, 2020	from 01.28.2021 to 02.15.2021	02.12.2021
	ITR – 1 st Quarter/2021	from 04.18.2021 to 05.04.2021	05.03.2021
	ITR – 2 nd Quarter/2021	from 07.15.2021 to 08.02.2021	07.30.2021
	ITR – 3 rd Quarter/2021	from 10.13.2021 to 10.29.2021	10.28.2021
DURATEX	Financial Statements/DFP December 31, 2020	from 01.24.2021 to 02.09.2021	02.08.2021
	ITR – 1 st Quarter/2021	from 04.14.2021 to 04.30.2021	04.29.2021
	ITR – 2 nd Quarter/2021	from 07.13.2021 to 07.29.2021	07.28.2021
	ITR – 3 rd Quarter/2021	from 10.12.2021 to 10.28.2021	10.27.2021
ITAÚ CORPBANCA	Monthly Information ^(2,3) – December/2020	from 12.28.2020 to 01.12.2021	01.12.2021
	Monthly Information ^(2,3) – January/2021	from 01.25.2021 to 02.09.2021	02.09.2021
	ITR ⁽¹⁾ – Full Fiscal Year 2020	from 01.17.2021 to 02.26.2021	02.26.2021
	Monthly Information ^(2,3) – February/2021	from 02.22.2021 to 03.09.2021	03.09.2021
	Monthly Information ^(2,3) – March/2021	from 03.28.2021 to 04.12.2021	04.12.2021
	ITR ⁽¹⁾ – 1 st Quarter/2021	from 04.15.2021 to 04.30.2021	04.30.2021
	Monthly Information ^(2,3) – April/2021	from 04.26.2021 to 05.11.2021	05.11.2021
	Monthly Information ^(2,3) – May/2021	from 05.25.2021 to 06.09.2021	06.09.2021
	Monthly Information ^(2,3) – June/2021	from 06.24.2021 to 07.09.2021	07.09.2021
	ITR ⁽¹⁾ – 2 nd Quarter/2021	from 06.30.2021 to 07.30.2021	07.30.2021
	Monthly Information ^(2,3) – July/2021	from 07.26.2021 to 08.10.2021	08.10.2021
	Monthly Information ^(2,3) – August/2021	from 08.25.2021 to 09.09.2021	09.09.2021
	Monthly Information ^(2,3) – September/2021	from 09.27.2021 to 10.12.2021	10.12.2021
	ITR ⁽¹⁾ – 3 rd Quarter/2021	from 09.29.2021 to 10.29.2021	10.29.2021
Monthly Information ^(2,3) – October/2021	from 10.26.2021 to 11.10.2021	11.10.2021	
Monthly Information ^(2,3) – November/2021	from 11.25.2021 to 12.10.2021	12.10.2021	
INVESTIMENTOS BEMGE and DIBENS LEASING	Financial Statements/DFP December 31, 2020	from 01.17.2021 to 02.06.2021	02.05.2021
	ITR – 1 st Quarter/2021	from 04.18.2021 to 05.08.2021	05.07.2021
	ITR – 2 nd Quarter/2021	from 07.18.2021 to 08.07.2021	08.06.2021
	ITR – 3 rd Quarter/2021	from 10.19.2021 to 11.10.2021	11.09.2021

(1) In Chile, Quarterly Information (ITR) is denominated as “Estados de Situación Intermedios”.

(2) Monthly Information published on Itaú CorpBanca and Superintendencia de Bancos e Instituciones Financieras Chile websites.

(3) Monthly Results release is on the 7th business day after closing.

DECLARATION

I,.....(name and qualification, including CPF or CNPJ tax registry number, as the case may be) in the quality of of ITAÚSA S.A., hereby **DECLARE**, in compliance with the requirements of Comissão de Valores Mobiliários Instruction 358/02, as amended, that I (bought/ sold shares/subscription warrants/equity options/ share subscription rights) issued by ITAÚSA S.A., having(reached, increased or decreased/eliminated)..... by% my (direct or indirect) participation , corresponding to (shares/subscription warrants/ equity options/share subscription rights/ any rights on shares and other securities and derivatives indexed to shares, even if without physical settlement provisions) representing the capital stock of ITAÚSA S.A., as described below:

I – Objective of my participation and the desired quantity:

.....
.....

[] – I declare that the acquisition made by me does not have the aim of modifying the Company's shareholding control structure nor its management structure. (Sign, as the case may be).

II – Quantity of shares, subscription warrants, subscription rights and equity options, by type and class, already held, directly or indirectly, by me or other person(s) related to me:

.....
.....

III – Quantity of derivatives indexed to shares, even if with no physical settlement provisions:

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.....

IV Indicate any agreement or contract regulating the exercise of voting rights and the right to trade in the Company's securities:

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.....

I hereby undertake to immediately report to the office responsible for corporate affairs any modifications to the positions hereby reported which represent a rise above or a drop below 5%, 10%, 15% and so on successively of the type or class of shares representing the capital stock of the Company.

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**INSTRUMENT OF ADHERENCE FOR CONTROLLING STOCKHOLDERS, MEMBERS OF
MANAGEMENT AND MEMBERS OF STATUTORY ORGANS**

I.....[name and CPF tax registry number], the undersigned, in the quality of a person subject to compliance with CVM Instruction 358/02, adheres to the POLICIES FOR THE DISCLOSURE OF MATERIAL INFORMATION and the TRADING OF SECURITIES ISSUED BY ITAÚSA S.A., of which I am at this moment receiving a copy.

The undersigned also declares that he/she is cognizant with the terms of those Policies and CVM Instruction nº 358/02, and undertakes to comply fully with the same, both on behalf of themselves and also their spouse (from whom the undersigned is not judicially or extrajudicially separated) or partner, their dependents included in the income tax return, and direct or indirect legal entities controlled by them, as follows:

Name/Corporate Denomination	CPF/CNPJ

The undersigned also declares that he/she is cognizant that:

- 1) the provisions of these Policies shall apply to the disclosure of material acts or facts and the trading of securities issued by the controlled companies ALPARGATAS, DURATEX, ITAUTEC and ITAÚ UNIBANCO HOLDING (and its controlled companies DIBENS LEASING, INVESTIMENTOS BEMGE and ITAU CORPBANCA);
- 2) compliance with the restricted periods listed in Attachment A of the Trading Policy is required;
- 3) trading is restricted if there is cognizance of any material act or fact not yet disclosed to the market;
- 4) restriction shall also apply to (i) stock lending; and (ii) the acquisition or sale of shares prior to the elapsing of 180 days, respectively, as from the previous sale or acquisition;
- 5) trading must be intermediated exclusively by **Itaú Corretora de Valores S.A.**;
- 6) any alterations in the information regarding spouses (from whom the undersigned is not judicially or extrajudicially separated) or partners, any dependent included in the income tax return, and legal entities controlled by them shall be informed within 15 days; and
- 7) compliance is required with the terms of these Policies for as long as there is a bond with the Company, with its controlling company, and with its controlled or affiliate companies and for a period of 6 months following termination.

Any failure to comply with these Policies, including on the part of the bound persons named above, shall **render the adhering party liable to disciplinary sanctions**, not limiting any administrative, civil and criminal penalties that may apply.

.....

INSTRUMENT OF ADHERENCE FOR STAFF MEMBERS

I.....[name and CPF tax registry number], the undersigned, in the quality of a person subject to compliance with CVM Instruction 358/02, adheres to the POLICIES FOR THE DISCLOSURE OF MATERIAL INFORMATION and the TRADING OF SECURITIES ISSUED BY ITAÚSA S.A., of which I am at this moment receiving a copy.

The undersigned declares that he/she is cognizant with the terms of these Policies and CVM Instruction nº358/02, and undertakes to comply fully with them.

The undersigned also declares that he/she is cognizant that:

- 1) the provisions of these Policies shall apply to the disclosure of material acts or facts and the trading of securities issued by controlled companies ALPARGATAS, DURATEX, ITAUTEC and ITAÚ UNIBANCO HOLDING (and its controlled companies DIBENS LEASING, INVESTIMENTOS BEMGE and ITAU CORPBANCA);
- 2) compliance with the restricted periods listed in Attachment A of the Trading Policy is required;
- 3) trading is restricted if there is cognizance of any material act or fact not yet disclosed to the market;
- 4) restriction shall also apply to (i) stock lending; and (ii) the acquisition or sale of shares prior to the elapsing of 180 days, respectively, as from the previous sale or acquisition;
- 5) trading must be intermediated exclusively by **Itaú Corretora de Valores S.A.**;
- 6) any alterations in the registered information shall be notified within 15 days; and
- 7) compliance is required with the terms of these Policies for as long as there is a bond with the Company, with its controlling company, and with its controlled or affiliate companies and for a period of 6 months following termination.

Eventual failure to comply with these Policies, shall **render the adhering party liable to disciplinary sanctions**, with no limitation on the administrative, civil and criminal penalties that may apply.

.....,
