

BANRISUL'S ANTI-CORRUPTION POLICY

The Anti-corruption Policy is designed to give visibility and record the principles and ethical values that should guide the conduct of employees, service providers, correspondents and all third parties performing activities on behalf or in the interest of Banrisul.

The guidelines, ethical standards and good practices that should be complied with are described below:

1. CONCEPT OF CORRUPTION

Corruption refers to all the acts whereby undue advantage is offered to a public agent with the aim of facilitating or accelerating any institutional procedure or defrauding competition, given that free competition should be the rule for government contracts. Unlike anti-corruption laws in other countries, the Brazilian system does not allow "facilitating payments"; all kinds of payment or gifts to public agents are therefore prohibited.

1.1 POLITICAL AIM

Provide the institution with anti-corruption procedures and controls and establish preventive measures that preclude, in Banrisul's scope of operations, the practice of the crimes of corruption and improbity in the Penal Code, In Law 8,666/93, Law 12.846/13 and the other rules in the Brazilian anti-corruption system by its employees and third parties acting on its behalf or in its interest.

2. AREA OF APPLICATION

All managers, employees, business partners, suppliers and service providers of the Bank, controlled companies and subsidiaries and under the same agreement, directly and indirectly, and, when applicable, non-profit entities managed by managers or employees appointed or assigned by companies that are members of the Banrisul Group, as well as all third parties acting on behalf, in the interest or to the benefit of Banrisul.

3. RULES AND REGULATIONS

3.1 RESPONSIBILITIES

All managers, employees, business partners, suppliers and service providers of the Bank, controlled companies and subsidiaries and under the same agreement, directly and indirectly, and, when applicable, non-profit entities managed by managers or employees appointed or assigned by companies that are members of the Banrisul Group, as well as all third parties acting on behalf, in the interest or to the benefit of Banrisul are responsible for promoting an ethical culture and establishing an environment of permanent control and prevention of corruption, in which it is possible to monitor and identify all client and non-client transactions (individual and companies), corruption or suspicion thereof, and to enforce the internal mechanisms and procedures of integrity, auditing and incentive to reporting irregularities and the effective application of this Policy and Banrisul's Code of Ethical Conduct.

3.2 ANTI-CORRUPTION RULES

Banrisul will adopt procedures proportional to the risk of corruption related to the nature, scale and complexity of its activities, including:

- adopting due diligence procedures proportional to the risk of corruption in its activities in all the contracting of third parties representing or acting in the interest of or to the benefit of Banrisul.

- providing regular training programs with the goal of training Banrisul's employees and raising their awareness of the values and principles of this Policy.

- carrying out regular monitoring and assessments to verify the effectiveness of the controls in order to prevent non-compliance with this Policy

All employees or third parties acting in the interest or to the benefit of Banrisul are obliged to act in an ethical and honest manner and perform their professional activities in accordance with the guidelines of Banrisul's Code of Conduct, namely:

- a) avoiding situations that represent a current or potential conflict of interest between their personal interests and the interests of the Company;
- b) refusing, in the exercise of their professional activities, any type of financial aid, tip, commission, gift, trip, donation or advantage for themselves or their family members or any other person acting on behalf, in the interest or to the benefit of Banrisul;
- c) properly using the Company's resources, intellectual properties, time and facilities;
- d) not sponsoring events or activities that may violate the Bank's rules on conflicts of interest;
- e) not using the Company's equipment, vehicles and facilities for personal use without prior consent and with the due refund;
- f) not allowing the granting of sponsorships to public agencies with the purpose of directly or indirectly facilitating direct contracts with public administration;
- g) not using Banrisul's name or its resources to fund the campaigns of political parties or candidates;
- h) not making statements on behalf of the Company, disclosing data, news and information related to Banrisul or any other company of the Group without being duly authorized to do so;
- l) avoiding using their job in their personal or professional relations in order to obtain benefits for themselves or for third parties;
- j) not establishing relationships of any nature with organizations or clients whose conduct is not compatible with the standards of ethics and responsibility;
- k) not accepting gifts, trips or any kind of advantage from clients, suppliers, partners and competitors;

- If it is a gift of an amount equal to or less than one hundred reais (R\$100.00) offered by a company that is not a Banrisul supplier, service provider or participant in a bid promoted by the Bank, and which is not somehow seeking a contracting advantage by offering said gift, it can be raffled among the employees in the respective sector.
 - all invitations for trips must be refused when the travel expenses are paid by third parties, even for participation in events and congresses or when the invitation is for friends and Family members of the Bank's employee
- l) not transmitting or transferring to third parties any information, documents, financial reports, accounting records, strategies, client records and/or programs containing secret data of Banrisul's exclusive interest;
 - m) not allowing behavior based on personal likes and dislikes or inadequate conduct to interfere in their relations with colleagues, irrespective of their hierarchical position;
 - n) not engaging in private activities inside Banrisul's premises or while representing the Company in professional activities outside its premises;
 - o) not violating any rules of the Company's compliance program, including the Code of Ethics, the Anti-Money Laundering Policy and the Know Your Employee Policy.

3.3 UNACCEPTABLE CONDUCTS

All employees and third parties acting on behalf, in the interest or to the benefit of Banrisul are prohibited from:

- a) suggesting, offering, promoting or granting, either directly or indirectly, requested or not, undue advantages of any nature (financial or not) to people and public and private companies in exchange for the performance or omission of acts inherent in their attributions or facilitation of businesses, operations or activities for Banrisul or aiming at benefits for themselves or third parties; and
- b) suggesting, soliciting, demanding, accepting or receiving, either directly or indirectly undue advantages of any nature (financial or not) from people and public and private companies in exchange for the performance or omission of acts inherent in their attributions or facilitation of businesses, operations or activities for Banrisul or aiming at benefits for themselves or third parties; and

Banrisul's Code of Ethics, Anti-money Laundering Policy and Know your Employee Policy complement this policy and also bring guidelines on preventing and fighting any and all kinds of corruption (bribes, influence peddling, favors, etc.), expressing Banrisul's conviction that all its activities or businesses should be carried out in an ethical, transparent and responsible manner.

3.4 REPORTING CHANNEL

Suspicious or evidence of corruption should be reported through the Reporting Channel available on the Intranet, where irregularities can be described and identification is optional.

3.4.1 ETHICAL COMMISSION

Any violation to this Policy will be examined by the Ethics Committee, pursuant to a specific regulation.

3.4.2 PROTECTION OF INFORMANTS

Informants will be guaranteed the right of secrecy and protection against retaliation.

3.4.3 *Audi alteram partem* Principle. Professionals who are reported for misconduct or violation of this Policy will be guaranteed full defense rights and the use of all possible evidence to ensure that no decision of the Ethics Committee is arbitrary.

3.5 PENALTIES

Non-compliance with any guidelines or principles established in this Policy is subject to the disciplinary sanctions in the Bank's Personnel Regulations, without prejudice to the application of the current laws.

3.6 ADHESION INSTRUMENT

All employees, after reading this Policy, will sign the Instrument of Compliance with the Banrisul Group's Anti-corruption Policy, under a specific model, which will, as of its signature, be part of the employment contract whereby employees declare they are aware of the rules and principles, as well as the responsibilities contained herein, incorporating Banrisul's other rules of conduct.

All managers, employees, business partners, suppliers and service providers of the Bank, controlled companies and subsidiaries and under the same agreement, directly and indirectly, and, when applicable, non-profit entities managed by managers or employees appointed or assigned by companies that are members of the Banrisul Group, as well as all third parties acting on behalf, in the interest or to the benefit of Banrisul will sign the Instrument of Compliance with this Policy or a compliance clause should be inserted in their respective contracts.

3.7 TRAINING

Banrisul's employees should receive anti-corruption training on a regular basis and mandatorily when they join the Group.

All managers, employees, business partners, suppliers and service providers of the Bank, controlled companies and subsidiaries and under the same agreement, directly and indirectly, and, when applicable, non-profit entities managed by managers or employees appointed or assigned by companies that are members of the Banrisul Group, as well as all third parties acting on behalf, in the interest or to the benefit of Banrisul shall undergo training.

The training modules should contain at least the main aspects regulated by Bannisul's Code of Ethical Conduct, this Policy, the current legislation and regulations, and should address different kinds of behavior that constitute evidence of corruption.

4. ASSOCIATED REGULATIONS

This Policy should be read and interpreted jointly with Bannisul's Code of Ethical Conduct, Anti-money Laundering Policy and Know your Employee Policy and the following documents:

- Anticorruption Law – no. 12,846/13;
- Law 8,666/93;
- Administrative Improbity Law – no. 8,429/92;
- Conflict of Interest Law – no. 12,813/13;
- Anti-money Laundering Law (Law 9,613, of March 3, 1998, amended by Law 12,683, of July 9, 2012);
- Brazilian Penal Code;
- United States Foreign Corrupt Practices Act (FCPA);
- United Nations Global Compact;
- United Nation's Convention against Corruption.