

CAIXA'S CODE OF ETHICS, CONDUCT, AND INTEGRITY

1 PURPOSE

- 1.1** To systematize the ethical values that guide how we conduct business for the CAIXA Conglomerate and engage in actions and relationships with internal and external audiences;
- 1.2** To guide the behavior of public agents when carrying out administrative activities and business on behalf of CAIXA, on or off premises;
- 1.3** To protect the institutional image and reputation of public agents, whose conduct complies with the standards established in this Code and other regulations;
- 1.4** To serve as a prior consultation instrument that promptly clarifies questions regarding the required ethical conducts;
- 1.5** To make the ethical rules of conduct for public agents clear so that society can assess the integrity and fairness of the decision-making process in the CAIXA Conglomerate;
- 1.6** To contribute with the improvement in ethical standards of the CAIXA Conglomerate, based on examples set by authorities at higher hierarchical levels;
- 1.7** To establish basic rules aimed at preventing situations that could result in conflicts between public and private interests and limiting professional activities carried out in parallel and after ending term of office;
- 1.8** To establish rules and regulations that justify the decisions taken by CAIXA's Ethics Commission and Conflict of Interest Prevention Commission, allowing administrative disciplinary proceedings to be installed, as applicable.
- 1.9** To establish guidelines that prevent, correct, and mitigate the risk of employees, suppliers, and partners of the CAIXA Conglomerate to be involved in acts of corruption.
- 1.10** To promote the strengthening of CAIXA's Integrity Program.

1.11 CAIXA'S CODE OF ETHICS, CONDUCT, AND INTEGRITY

1.11.1 PRELIMINARY PROVISIONS

- 1.11.1.1** This Code defines CAIXA's principles, values, purpose, and mission and provides guidelines on preventing conflicts of interest and prohibiting acts of corruption and fraud, in addition to other prohibited conducts, applicable to all public agents operating in the CAIXA conglomerate or in its statutory bodies, councils, committees, or holding positions in other companies or entities recommended or appointed by CAIXA.
- 1.11.1.2** The provisions contained in this Code must be observed, notwithstanding the application of the provisions of the Professional Ethics Code for Civil Servants of the Federal Executive Branch and, as applicable, the Code of Conduct for Senior Federal Administrators, which are attached to this normative.
- 1.11.1.3** Professional duties must be guided by high ethical conduct standards, based on respect, honesty, commitment, transparency, and responsibility.
- 1.11.1.4** Dignity, decorum, zeal, effectiveness, and awareness of moral principles must guide all professional and non-professional activities.
- 1.11.1.5** Conducts must consider not only legal and illegal, fair and unfair, convenient and inconvenient, appropriate and inappropriate aspects, but also honesty and dishonesty to achieve a common good.
- 1.11.1.6** The exercise of professional activities at CAIXA equates to public services, in which public agents must comply with legal or regulatory standards and normative manuals that govern their activities.
- 1.11.1.7** CAIXA offers its employees and society a reporting channel for internal and external complaints regarding non-compliance with this Code and other internal ethical and mandatory standards.
- 1.11.1.8** CAIXA ensures protection mechanisms to prevent any retaliation against individuals who file complaints with the reporting channel.
- 1.11.1.8.1** The Reporting Channel is available full time for all individuals at:
- Website: <https://www.contatoseguro.com.br/caixa>
 - Internet CAIXA: www.caixa.gov.br/denuncia
 - Intranet: <https://caixa.sharepoint.com/sites/pessoas/SitePages/Empregado-Canais-de-Atendimento-Canal-de-Denuncia.aspx>.

- Phone: 0800 512 66 77
- The "Contato Seguro" application available for Android and IOS smart phones.

1.11.1.9 Corruption harms democracy and the Rule of Law, creates instability and insecurity in the work environment, and promotes mistrust among society, in addition to negatively impacting the reputation of all parties involved in business transactions with CAIXA.

1.11.1.10 CAIXA is committed to domestic and international anti-corruption laws and does not tolerate any form of fraud and corruption within the CAIXA Conglomerate or in its interactions with public or private entities.

1.11.1.11 CAIXA advises its employees to repudiate any type of active or passive corruption, bribery, illegal payments, facilitation payments, and influence peddling.

1.11.1.12 CAIXA ensures that due investigation and appropriate treatment shall be carried out by the competent area regarding conducts that may violate the principles established in this Code, identified by duty or resulting from a report or complaint, so long as the necessary information is available to initiate an investigation process.

1.11.1.13 Any disciplinary or administrative sanction shall be substantiated, reasonable, and proportional to the effects of the action, omission, fact, or event that occurred, and shall be applied according to the provisions in relevant legislation and regulations.

1.11.1.13.1 Any violation to the rules of this Code, in which contradictory and broad defense shall be ensured, makes public agents subject to ethical and disciplinary sanctions, such as ethical censorship, warning, suspension, and termination of employment contract, notwithstanding civil responsibilities to repair damages caused to CAIXA.

1.11.1.14 All information, programs, models, documents, and methodologies developed or used by CAIXA belong exclusively to the institution, regardless of a public agent having participated in their development.

1.11.1.15 Employees working in the securities market are considered Related Persons to CAIXA and, therefore, must keep their registration data updated at their working unit, in addition to observing specific conduct regarding their activities, as provided by legislation.

1.11.1.16 Public agents have a deadline of 6 months to withdraw from parallel professional activities prohibited in this Code, as of when it has been informed to the CAIXA Ethics Commission, in situations involving employees, and to the Public Ethics Commission in situations involving directors and members of statutory bodies.

1.11.1.17 Any company whose administrator or partner is a public agent is prohibited from participating in public biddings carried out by CAIXA, in addition to the prohibition of being hired by CAIXA.

1.11.2 PRINCIPLES

1.11.2.1 CAIXA Conglomerate's operations are established under the principles of ethics, transparency, equality, corporate responsibility, accountability, social, environmental and climate responsibility, commitment to sustainable development, public spirit, integrity, and inclusion.

1.11.3 VALUES

1.11.3.1 RESPECT.

1.11.3.1.1 People at CAIXA are treated with ethics, justice, respect, courtesy, equality, and dignity.

1.11.3.1.2 We require our employees, collaborators, directors, and members and representatives of statutory bodies to have absolute respect for human beings, public assets, society, and the environment.

1.11.3.1.3 We repudiate any type of prejudice related to origin, gender, race/color, generation, religion, creed, social class, physical disability, sexual orientation/gender identity, and any other forms of discrimination.

1.11.3.1.4 We respect and value our clients and their rights as consumers and holders of personal data by providing correct information, complying with agreed deadlines, and offering alternatives to meet their business needs with CAIXA.

1.11.3.1.5 We preserve the dignity of our employees, collaborators, directors, and members and representatives of statutory bodies under all circumstances, and we strive to eliminate all harassment, provocation and embarrassment situations in the work environment that may diminish their self-love and moral integrity.

1.11.3.1.6 Our sponsorships focus on respecting customs, traditions, and values of society, as well as preserving the environment and sustainability.

1.11.3.1.7 CAIXA processes all collected data with responsibility and ethics throughout the life cycle of the information, respecting privacy and legislation relating to the matter, including the use and treatment of databases.

1.11.3.1.7.1 CAIXA's commitment to ethics and integrity in its operations applies in any environment, including digital channels, as well as to the treatment and processing of data.

1.11.3.2 HONESTY

1.11.3.2.1 When carrying out professional activities, our employees, collaborators, directors, and members and representatives of statutory bodies must keep CAIXA's interest first in mind, above personal interests and the interests of groups or third parties, in such a way that it protects the integrity of the Institution's processes and image.

1.11.3.2.2 We manage our business, society's resources, funds, and programs with honesty, offering equal opportunities in transactions and employment relationships.

1.11.3.2.3 We do not tolerate any unfair relationship or conduct that results in conflict of interest and does not meet the highest ethical standards.

1.11.3.2.4 We do not accept conducts that jeopardize CAIXA's image and compromise its staff.

1.11.3.2.5 We condemn conducts that privilege suppliers and service providers, under any pretext.

1.11.3.2.6 We condemn the request for donations and contributions of material goods or values to commercial or institutional partners on behalf of CAIXA, under any pretext.

1.11.3.3 COMMITMENT

1.11.3.3.1 Employees, collaborators, directors, directors, and members and representatives of statutory bodies are committed to the uniformity of procedures and the highest ethical standards in the exercise of their professional duties.

1.11.3.3.2 We are permanently committed to complying with laws, rules, and internal and external regulations that govern our Institution.

1.11.3.3.3 Our relationships with clients, suppliers, correspondents, affiliates, subsidiaries, sponsored companies, associations and professional entities are guided by the principles of this Code.

1.11.3.3.4 We are committed to offering quality products and services that meet or exceed our clients' expectations.

1.11.3.3.5 We provide the right guidance and information to our clients so they can make educated decisions in their businesses.

1.11.3.3.6 The products and services offered to our clients must be suited according to their profile and must comply with legislation.

1.11.3.3.7 We preserve the confidentiality and security of information, and work to ensure the confidentiality, integrity, availability, and authenticity of information.

1.11.3.3.8 Our relationships with competitors are guided by the principles of ethics and integrity.

1.11.3.3.8.1 We do not make value judgments on our competitors or their products and services.

1.11.3.3.9 We strive for fair working relationships, improving the safety and health conditions in our work environment, preserving the quality of life of those who work there, with respect and appreciation for people in their diversity and dignity, through mutual trust, cooperation, meritocracy, and solidarity.

1.11.3.3.10 We encourage voluntary participation in social activities aimed at restoring the citizenship of the Brazilian people.

1.11.3.4 TRANSPARENCY

1.11.3.4.1 CAIXA's relations with segments of society are guided by the principle of transparency and adopt technical criteria.

1.11.3.4.2 As a public company, we are committed with the accountability of our activities, the resources we manage, and the integrity of our control mechanisms.

1.11.3.4.3 We provide clients, business partners, suppliers, and the media with equal treatment in the availability of clear and timely information, through authorized sources and in strict compliance with the regulations we are subject.

1.11.3.4.4 We offer our employees opportunities for professional growth, using clear criteria that is available to everyone.

1.11.3.4.4.1 All forms of recognition, reward, awards, evaluation, and investment in people are guided by clear and meritocratic criteria, in which favoritism and nepotism are strictly prohibited.

1.11.3.4.5 We value the internal communication process, in which relevant information related to business and corporate decisions are disclosed.

1.11.3.5 RESPONSIBILITY

1.11.3.5.1 Our actions are based on the precepts and ethical values of this Code, therefore protecting CAIXA from inappropriate actions and misconducts regarding its mission and image and not harming or compromising, directly or indirectly, our employees, collaborators, directors, and members and representatives of statutory bodies.

1.11.3.5.2 We ensure that public assets are protected through the appropriate use of information, assets, equipment, and other resources made available for us to effectively manage our business.

1.11.3.5.3 We seek environmental protection of the projects we participate in, as we understand that life directly depends on the quality of the environment.

1.11.3.5.4 We guarantee protection against any type of retaliation or professional discrimination to anyone who reports violations of this Code, as a way of preserving CAIXA's values.

1.11.3.5.5 We are collectively and individually responsible for cybersecurity to prevent the Institution from possible cybercrimes and financial, legal, and reputational losses.

1.11.4 PURPOSE AND VISION

1.11.4.1 To be the public financial institution that promotes inclusion and sustainable development, transforming people's lives.

1.11.4.2 To become a reference for the Brazilian society through social and commercial relationships, fostering financial citizenship, sustainable development, and excellence in executing public policies, with efficiency and profitability.

1.11.5 GUIDELINES ON PREVENTING CONFLICT OF INTEREST

1.11.5.1 Conflict of interest is a situation when CAIXA's interests, including by third parties, except from the mandate of investment funds/managed portfolios, is confronted by personal interest that may compromise the collective interest or negatively influence the performance of public services, including voluntary work in non-profit third sector organizations.

1.11.5.2 A conflict of interest occurs when personal interests influence or may influence, directly or indirectly, the analysis and decisions taken when exercising activities at CAIXA or representing the Institution.

1.11.5.3 Personal interest is characterized by a public agent's desire to obtain any personal advantage, immediate or not, material or not, or to benefit relatives, friends, or others with whom they have, or have had, a personal, commercial, or political relationship and that may jeopardize CAIXA or third parties in which CAIXA represents through mandates.

1.11.5.4 A conflict of interest may occur regardless of damage to public property or an actual benefit, financial or not, gained by a public agent or third party.

1.11.5.5 The following situations classify as a conflict of interest in a working relationship with CAIXA:

- disclosing or using privileged information for personal benefit or to benefit third parties, obtained through professional activities;
- executing activities that involve services or maintenance of a business relationship with an individual or legal entity, including a banking correspondent and licensed lottery unit, who has an interest in the decision taken by a public agent or a collegiate body in which the agent is a member;
- executing, directly or indirectly, activities that, due to their nature, are incompatible with the duties of the position or job, including activities in related areas or matters;
- acting, even if informally, as an attorney, consultant, advisor or intermediary for private interests in direct or indirect public administration entities or bodies of any of the Federal, State, Federal District and Municipal governments;
- acting on behalf of a legal entity in which a public agent or his/her spouse, partner, or relatives, in a direct or collateral line, bloodline or by affinity, up to the third degree, are members and which may be benefited or influenced by their management decisions;
- receiving gifts from parties interested in decisions taken by a public agent or a collegiate body in which he/she is a member, excluding the limits and conditions established in decree 10,889/2021 and this Code;
- providing services, even if occasionally, to a company whose activity is controlled, supervised, or regulated by an entity linked to a public agent;

1.11.5.6 To prevent or impede conflicts of interest in work relationship at CAIXA or outside the Institution, public agents must adopt, according the specific situation, one or more of the following measures:

- resign from the conflicting activity, or request dismissal from the current role, or return to their original working unit, or request dismissal as representative, or request to be transferred to another working unit;
- sell the assets and rights that could give rise to the conflict of interest.

1.11.5.6.1 In the event of a conflict of interest, even if for a specific and temporary situation, public agents must formalize the occurrence of the conflict of interest to their hierarchical superior and other members of the collegiate body of which they participate if a collective decision must be made, abstaining from voting or participating in discussions regarding the matter.

1.11.5.6.1.1 When adopting the measures referred to in item [1.11.5.6.1](#) the employee must inform the situation and the measures adopted, in detail, to CAIXA's Conflict of Interest Prevention Commission, through mailbox CORED02.

1.11.5.6.1.2 When adopting the measures referred to in item [1.11.5.6.1](#) the director or statutory member must inform the situation and the measures adopted, in detail, to the Public Ethics Commission, who will issue an opinion on the matter.

1.11.5.7 Consultation on the existence of a conflict of interest and requests to authorize the performance of private activities are standardized.

1.11.5.7.1 In the event an employee has any questions on how to prevent or impede a potential situation of conflict of interest, or questions regarding the exercise of parallel professional activities, he/she must consult the specific situation through SeCI, provided by the CGU on the following webpage: <https://seci.cgu.gov.br/seci/Login/Externo.aspx?ReturnUrl=%2fseci%2fSite%2fDefault.aspx>.

1.11.5.7.2 In the event a director or member of a statutory body has any questions on how to prevent or impede a potential situation of conflict of interest, or questions regarding the possibility of exercising parallel professional activities, they must submit a formal consultation with the Public Ethics Commission, in addition to informing what measures have been adopted.

1.11.5.7.3 In the event a director or member of a statutory body has any questions on a conflict of interest in the exercise of a parallel professional activity they intend to pursue, or regarding a potential conflict of interest that may occur, they must submit a formal consultation about the specific situation directly to the Public Ethics Commission.

1.11.5.8 A public agent who also holds a position or role in another institution may not engage in any acts that benefit the interest of CAIXA and harm the other institution, in addition to complying with the provisions of this Code.

1.11.5.9 Teaching activities do not require prior consultation regarding conflict of interest or authorization to be executed as a parallel professional activity, except for situations that may give rise to a conflict of interest, and are permitted, including for directors, pursuant to the provisions of Law 12,813, of May 16, 2013, and the following conditions:

- compatibility with the work schedule;
- compliance with the rules relating to the accumulation of public roles and positions; and
- compliance with specific legislation applicable to the legal regime of the public role or position held.

1.11.5.9.1 Exercising teaching activities for a specific audience that has an interest in decisions taken by a public agent, the institution or the collegiate in which the public agent is a member must be previously consulted regarding the existence of a potential conflict of interest.

1.11.5.9.2 Teaching activities, even if occasional or non-remunerated, are understood as:

- being a member of the academic body of education, research, science, or technology institutions, public or private, domestic or foreign;
- providing training, through courses, lectures, or conferences for a specific audience or not;
- other related activities, including the roles of coordinator, monitor, evaluator, member of a student examination board, writer, or debater.

1.11.5.9.3 The President, Vice Presidents, and Directors of CAIXA may perform activities in Councils and Committees in directly or indirectly related companies, affiliated, investees, and/or FUNCEF, according to the provisions and guidelines contained in CAIXA's Bylaws.

1.11.5.9.3.1 The exercise of activities in other companies in which CAIXA does not hold an equity stake, including investees of FI-FGTS and FUNCEF, by the President, Vice Presidents, and Directors of CAIXA, require prior and express authorization from CAIXA's Board of Directors and must comply with the provisions of current regulations and CAIXA's Bylaws.

1.11.6 CONDUCTS TO BE OBSERVED AND PROHIBITED CONDUCTS

1.11.6.1 The conducts listed in the following sub-items are examples and must take into consideration the elements that characterize each situation when classifying them as non-compliance with the indicated behavior or conduct.

1.11.6.2 MORAL AND SEXUAL HARASSMENT

1.11.6.2.1 Conducts that characterizes moral and sexual harassment are not tolerated by CAIXA and, to prevent this from happening, public agents must adopt the following conducts:

- a) Do not threaten subordinates with dismissal, transfer, or removal from a rewarded role;
- b) Do not impose personalized working conditions and rules, different from those established for other employees and by CAIXA, with the intent of harming employees, managers or collaborators;
- c) Do not cause or encourage, and oppose and report any situations of humiliation, intimidation, discrimination, exposure to ridicule, hostility, or embarrassment in the presence of others or in private;
- d) Do not use rude and inappropriate words or gestures or make malicious comments, prejudice or discriminatory insults, use pejorative nicknames, bully or make inappropriate jokes;
- e) Do not behave in a way that emotionally and professionally destabilizes any person, with accusations, insults, shouting and/or public humiliation;
- f) Do not segregate employees or collaborators in the work environment through physical isolation in such a way that they can not communicate with other colleagues and/or omit having direct communication;
- g) Do not impose humiliating punishments on employees and collaborators;
- h) Do not repeatedly remove the autonomy of an employee and/or collaborator to the detriment of the skills and tasks that have been normatively assigned for the position or role;
- i) Do not overwhelm an employee and/or collaborator with new tasks or remove work that was commonly under their responsibility without a fair institutional and notified reason, causing the feeling of uselessness and incompetence;
- j) Do not mock and/or expose the opinions of an employee and/or collaborator in a humiliating manner;
- k) Do not delegate tasks that are impossible to complete or set completion deadlines that are clearly incompatible;
- l) Do not omit or manipulate necessary information, on a recurring basis, always informing the employee in advance so he/she can execute the required activities;
- m) Do not engage in excessive surveillance over employees and/or collaborators in their work environment;
- n) Do not limit the number of times an employee and/or collaborator can use the bathroom and/or monitor the time they spend there;
- o) Do not instigate control of an employee and/or collaborator by another, creating surveillance outside the hierarchical structure;
- p) Do not pressure an employee and/or collaborator in not exercising his/her labor rights;
- q) Do not interfere in selection processes aimed at jeopardizing or preventing the promotion of an employee and/or collaborator due to personal reasons, persecution, or discrimination;

1.11.6.2.2 Public agents are prohibited from practicing acts of Sexual Harassment within the scope of their work relationships, aimed at obtaining sexual favors or advantages and, to prevent this from occurring, public agents must adopt the following conducts:

- a) Do not use gestures or words, written or spoken, of sexual nature or with double meanings;
- b) Do not engage in unwanted and offensive conversations about intimate topics;
- c) Do not make or insist on unwanted sexual invitations;
- d) Do not send messages, by any means, or make calls containing sexual content as a way of intimidating any person with whom you only have a working relationship;
- e) Do not persecute and disturb others on the Internet, social media, and on the streets;
- f) Do not capture, leak, or threaten to leak intimate images aimed at obtaining sexual favors or advantages;
- g) Do not make comments about physical attributes or looks in a way that embarrasses, diminishes or intimidates;
- h) Do not make references to the sexuality, sexual orientation, gender identity, or body of any person, as well as obscene remarks, jokes, sexual provocations, or insistent and/or impertinent and unwanted invitations;
- i) Do not approach anyone in a rude and offensive manner with inappropriate or sexist proposals;
- j) Do not offer advantages of any nature, use blackmail, make threats of firing or transferring, or engaging in acts that jeopardize the work activity of an employee or collaborator to obtain sexual favors or advantages;
- k) Do not promote inappropriate or unwanted physical contact with an employee, collaborator, or client;
- l) Do not embarrass an employee, collaborator, or client by means of invitations, approaches and/or insinuations, explicit or not, of sexual nature;
- m) Do not engage in behaviors of sexual nature with the intent of destabilizing the work performance of an employee, collaborator, or client in an offensive, intimidating and/or humiliating situation.

1.11.6.3 PARALLEL PROFESSIONAL ACTIVITIES WHILE WORKING AT CAIXA

1.11.6.3.1 To prevent situations of conflict of interest when carrying out parallel professional activities while working at CAIXA, public agents must adopt the following conducts:

- a) Do not offer advice/consultancy or other types of services to legal entities or individuals that may benefit from internal and specific knowledge acquired by working in any department at CAIXA, except if authorized by CAIXA;
- b) Do not establish commercial or professional relationships, directly or through third parties, with CAIXA's clients, their controlling shareholders and companies in their same economic group, when a public agent has decision-making powers over the client's interests in their relationship with CAIXA;
- c) Do not engage activities that violate the principles of full-time dedication by the person holding the position of director, ombudsman, and inspector, whose duties for these positions or for rewarded roles must prevail over any other activities;
- d) Do not exercise the following activities while working at Caixa:
 - financial consultant, regardless of the role or working unit, including investment agents, stock exchange broker, market analyst, financial coach and other type of activity that provides guidance on financial investments;
 - insurance broker, regardless of the role or working unit;
 - real estate broker, regardless of the role or working unit;
 - partner, employee, consultant, or administrator of a construction/development company, regardless of the role, professional career, function or working unit.
- e) Do not negotiate, personally or on behalf of others, products or services that constitute as an act of competition with CAIXA or the Conglomerate;
- f) Do not maintain an employment relationship or provide engineering/architectural services in a banking organization or company that competes with CAIXA;
- g) Do not act as an attorney against CAIXA or the Conglomerate, FUNCEF, the Federal Government, federal agencies, foundations and dependent state-owned companies, as well as in lawsuits involving CAIXA and its interests, unless the role of the public agent is to serve as a lawyer at CAIXA;
- h) Do not become a partner or work in a law firm that promotes lawsuits involving CAIXA;
- i) Do not maintain an employment relationship or provide legal services in a banking organization or company that competes with CAIXA;
- j) Do not act as an attorney or provide legal advice on behalf of employees who are responding to disciplinary or ethical proceedings, in relation to said proceedings or processes.

1.11.6.3.2 Holders of management positions and roles at any management level at CAIXA are prohibited from acting as private attorneys.

1.11.6.3.2.1 Holders of management and leadership positions in CAIXA's Legal Units are exclusively authorized to act as attorneys in legal proceedings linked to the role they perform at CAIXA during their term of office, as well as in lawsuits on behalf of their spouses or relatives, up to the third degree, in a direct or collateral line by blood or affinity, so long as it does not jeopardize their regular professional activities.

1.11.6.4 CRITICAL BEHAVIORS ON SOCIAL MEDIA NETWORKS TO PRESERVE THE REPUTATION OF EMPLOYEES AND CAIXA'S IMAGE AND TO MEET PRIVATE INTERESTS

1.11.6.4.1 To prevent the materialization of situations that may damage CAIXA's image and/or reputation, or situations of any other nature, public agents must adopt the following conducts:

- a) Do not publish any information that offends CAIXA's image and the image/reputation of its public agents on social media;
- b) Do not use CAIXA's logos on social media;
- c) Do not comment/share any restricted or confidential information relating to CAIXA on social media;
- d) Do not publish/share work and operating routines of CAIXA and its working unit on social media;
- e) Do not publish photos and images of the interior of CAIXA's working units that weaken security and expose information on social media;
- f) Do not make comments on behalf of CAIXA on social media, except under the conditions foreseen by law;
- g) Use the appropriate corporate channels for communication, which must always be made in a cordial and well-founded manner;

- h) Do not behave in a way that harms the work environment and criticizes the reputation of colleagues, superiors, and CAIXA;
- i) Do not use colleagues, service providers, interns, or young apprentices to serve private interests;
- j) Do not exercise parallel professional activities that raise concerns regarding the integrity, morality, clarity of positions and decorum of an employee or director;
- k) Do not file complaints and/or irregular facts against someone you know is innocent or report facts that are non-existent;
- l) Do not engage in discriminatory actions related to origin, race, gender, color, age, religion, creed, social class or physical disability.

1.11.6.5 CONDUCTS WHEN PARTICIPATING IN EVENTS AND ACTIVITIES SPONSORED BY THIRD PARTIES AND CAIXA

1.11.6.5.1 Public agents may participate in external activities, such as seminars, congresses, lectures, visits, technical meetings, and similar events, in Brazil or abroad, of institutional interest, so long as they comply with the following requirements:

- a) Invitations to participate in events organized or promoted by a private institution must be sent to the President's Office or another body or authority designated by it, who will indicate, if the invitation is accepted, the appropriate representative considering the nature and matters to be addressed at said event;
- b) Expenses such as transportation, accommodation, meals, and registration fees related to a public agent's participation in events promoted by a private institution and that are related to the duties of his/her position, job, or role, must be paid by CAIXA;
- c) Expenses for transportation, accommodation, meals, and registration fees may be exceptionally paid, entirely or partially, if the sponsor of the event is:
 - an international organization of which Brazil is a member;
 - a foreign government or any of its institutions;
 - an academic, scientific, or cultural institution;
 - a company, entity or trade association that does not maintain, or plans to maintain, a business relationship and that may not be the beneficiary of a decision made by a public agent, either individually or collectively;
 - an individual or legal entity in a business relationship with CAIXA, so long as it arises from a contractual obligation previously assumed with CAIXA.
- d) Public agents may not be compensated for exercising the role of an institutional representative;
- e) When the matters to be addressed at the event are related to their institutional roles, CAIXA's heads of divisions, directors, and members of statutory bodies are not allowed to accept invitations to dinners, lunches, breakfasts, and other activities of similar nature that are paid by third parties.

1.11.6.5.2 When exercising an external representation, public agents must guide their actions according to CAIXA's mission and institutional interests.

1.11.6.5.3 External activities of personal interest may not be carried out to the detriment of the activities carried out at CAIXA, except when expressly authorized by the manager.

1.11.6.5.4 When participating in events of personal interest, public agents must not comment on facts or issue opinions on matters related to CAIXA.

1.11.6.5.5 For events of personal interest, public agents must pay for their own expenses, such as participation fees for courses, seminars, congresses, or similar events, and these activities must not conflict with the exercise of a position or role of trust, in addition to not making use of privileged information. The invitation to participate in the event, when received and pursuant to this Code, must be communicated, by the employee, to his/her manager and, by directors and members of statutory bodies to the Public Ethics Commission.

1.11.6.5.5.1 Expenses related to remuneration, transportation, and accommodation may be paid by the sponsor of the event, exceptionally, provided that:

- the employee communicates to CAIXA's Conflict of Interest Prevention Commission, pursuant to this Code, and by directors and members of statutory bodies to the Public Ethics Commission, prior to the event, the conditions for their participation, including the amount of remuneration, if applicable;
- the sponsor of the event does not have interest in a decision that can be taken by a public agent, either individually or collectively;
- participating in the event does not cause a conflict of interest with the activities exercised for the position or role;

- the sponsor is not an institution that has a relationship or commercial interest with CAIXA;
- there is no use of privileged information;

1.11.6.5.6 Publicity regarding expenses for remuneration, transportation, meals, and accommodation shall be ensured by recording the event in the public agent's respective work agenda, with details on the conditions of his/her participation.

1.11.6.5.6.1 Data on expenses regarding "Daily Rates, Hotels, and Tickets" for external and internal events, held in Brazil and abroad and paid by CAIXA, are published on the Federal Government's Transparency Portal.

1.11.6.6 PERSONAL INVESTMENTS

1.11.6.6.1 To prevent situations of conflict of interest and the use of privileged information, public agents must not make personal investments whose remuneration or quotation may be affected by a decision or fact in which they had previously participated, had prior knowledge, or gained access to privileged information while exercising their activities at CAIXA, the CAIXA Conglomerate, and FUNCEF.

1.11.6.6.1.1 Financial investments in banking or financial products with pre-established standards and norms, and which are also offered to the public, may be kept by public agents.

1.11.6.6.2 A public agent characterized as a "Related Person" under current legislation is prohibited to execute operations through other institutions for the B3 markets in which CAIXA offers intermediation and securities distribution services, being only authorized to carry out operations through CAIXA.

1.11.6.6.2.1 A public agent characterized as a "Related Person" must maintain their personal registration data updated, in addition to having an active custody account with CAIXA (Home Broker CAIXA), as well have registered data for applicable family members, pursuant to current regulations.

1.11.6.7 NEPOTISM

1.11.6.7.1 To prevent situations that can characterize the practice of nepotism, public agents must adopt the following conducts:

- a) Do not appoint a family member as an employee for a Rewarded Role, or have a family member under his/her direct or indirect subordination, even if the role is not a rewarded role;
- b) Do not appoint family members from third-parties for a Rewarded Role as a way of adjusting reciprocal designations, including at subsidiary companies;

1.11.6.7.1.1 A family member is classified as a spouse, partner, or relative, in a direct or collateral line, by blood or affinity, up to the third degree, namely:

- son/daughter, stepson/stepdaughter, grandson/granddaughter, great-grandson/great-granddaughter, parents, grandparents, and great-grandparents;
- siblings, uncle/aunt, and nephew/niece;
- siblings of a spouse or partner;
- in-laws;
- spouses of: siblings, uncle/aunt, nephew/niece, grandson/granddaughter, and great-grandson/great-granddaughter.

1.11.6.8 OBSERVANCE TO THE PRINCIPLES OF SOCIO-BUSINESS RESPONSIBILITY

1.11.6.8.1 Public agent must comply with the principals of social and corporate responsibility, not hiring suppliers and/or not establishing partnerships with entities or companies that practice child and/or slave-like labor or who adopt practices contrary to the International Bill of Human Rights, the Statute of the Elderly, the Statute of Children and Adolescents, and the Statute of Persons with Disabilities.

1.11.6.9 OBSERVANCE TO THE PRINCIPLES OF PUBLIC ADMINISTRATION

1.11.6.9.1 To comply with the principles of public administration, public agents must adopt the following conducts:

- a) Do not engage in acts that are prohibited by law or regulation, or acts that are contrary to the one provided for in the rule of jurisdiction;
- b) Do not delay or fail to perform, unduly, an official act;
- c) Do not reveal a fact or circumstance that a public agent has gained awareness due to his/her duties and which must remain confidential;

- d) Publicize all official acts, when not protected by confidentiality or any other form of restriction of access to information;
- e) Do not disrupt the lawfulness of public tenders;
- f) Provide accountability, when obliged to do so;
- g) Do not consume alcoholic beverages or drugs at CAIXA's working units, premises, or facilities;
- h) Do not carry any type of weapons at CAIXA's working units, premises, or facilities, except when inherent to their activities and authorized by specific legislation.

1.11.6.10 PUBLIC OFFERINGS FOR THE DISTRIBUTION OF SECURITIES

1.11.6.10.1 Public agents who engage in activities linked to the intermediation of public offerings for the distribution of securities must adopt the following conducts:

- a) Take all precautions and act with high standards of diligence, accounting for any lack of diligence or omission, thus ensuring that the information provided is true, consistent, correct, and sufficient, allowing investors to make informed decisions regarding the offering, and observing the rules established in the regulation for public offerings for the distribution of securities;
- b) Publicly disclose the offering under the terms established in the regulation for the public offering of primary or secondary distribution of securities on regulated markets;
- c) Disclose any conflicts of interest to investors;
- d) Ensure that the investment is appropriate for the level of sophistication and risk profile of the investors, pursuant to specific CVM regulations on the topic;
- e) Ensure that the means of communication, advertising, and language used to communicate with investors are appropriate and meet the complexity of the offering and the level of sophistication of the investors;
- f) Maintain updated and in perfect order, pursuant to the conditions and deadlines established in the internal rules and regulations, all documentation relating to the intermediation of public offerings for the distribution of securities;
- g) Ensure that the information disclosed and the allocation of the offering do not privilege related parties to the detriment of non-related parties;
- h) Do not guarantee or suggest that a guarantee exists for future results or that investors are exempt from risks;
- i) Do not make projections regarding future returns that do not comply with the offering documents.

1.11.6.11 PREVENTION OF CORRUPTION, BRIBERY, AND HARASSMENT

1.11.6.11.1 To prevent the materialization of acts characterized as corruption, bribery, or harassment, public agents must adopt the following conducts:

- a) Guide relationships with institutional bodies, entities, and companies under the principles of legality, impersonality, morality, publicity, and efficiency, ensuring broad transparency of information to society;
- b) Report, through the channels made available by CAIXA, any acts that are contrary to public interest and this Code, behaviors that indicate signs of corruption, and irregular situations carried out by hierarchical superiors, colleagues, contractors, or service providers that may give rise to a conflict of interest;
- c) Do not attract clients, or maintain current ones, by offering benefits that are not allowed by current regulations;
- d) Do not engage in corrupt and money laundering practices;
- e) Do not offer or receive bribes, including for international relationships, even if said action is not prohibited in the country where the business relationship takes place;
- f) Do not plead, request, provoke, suggest, or receive any type of financial aid, bonus, prize, commission, donation, or advantage of any kind, for public agents personally, their family members, or any other person to fulfill their mission or to influence another employer for the same purpose;
- g) Do not receive transportation, accommodation, meals, or any favors from individuals, including clients, suppliers, or service providers, in such a way that it creates a situation that may give rise to concerns about their probity or honorability;
- h) Do not engage in any type of harassment, verbal, or physical conduct that involves humiliation, coercion, or threats.

1.11.6.12 PREVENTION OF ILLICIT ENRICHMENT

1.11.6.12.1 To prevent situations that can characterize illicit enrichment, public agents must adopt the following conducts:

- a) Do not receive, personally or on behalf of others, money, movable assets, properties, or any other direct or indirect financial advantage such as commissions, stakes, bonus, or gifts from anyone who has a direct or indirect interest that may be achieved or supported by an action or omission arising from the duties of public agents;
- b) Do not receive direct or indirect financial advantages, of any nature, to:
 - facilitate the acquisition, exchange, or rental of properties or movable assets or the hiring of services by companies of the CAIXA Conglomerate;
 - facilitate the sale, exchange, or rental of public assets or the provision of services by a state company;
 - intermediate the release or allocation of public funds of any nature;
 - tolerate the exploitation or practice of acts such as gambling, incitement to prostitution, drug trafficking, smuggling, usury, or any other illicit activity or to accept the promise of any of these activities;
 - make false statements on the measuring or assessment of public works, or any other service, regarding the amount, weight, measure, quality, or characteristic of goods or services supplied to any of the companies of the CAIXA Conglomerate;
 - omit an official act, service or declaration to which public agents are obliged;
 - any other illicit or unauthorized purpose.
- c) Do not use, in private works or services, vehicles, machinery, equipment, or material of any nature that is owned by or made available to any of the companies of the CAIXA Conglomerate, as well as for the work of public servants, employees, or third parties hired by said companies;
- d) Do not acquire, personally or on behalf of others, during the exercise of a public agent's mandate, position, employment, or public role, assets of any nature whose worth is disproportionate to the growth in a public agent's assets or income;
- e) Do not incorporate, by any means, into a public agent's assets any type of income, funds, or values that are part of the assets of the companies of the CAIXA Conglomerate;
- f) Do not use, for personal benefit, assets, income, funds or values that are part of the assets of the companies of the CAIXA Conglomerate.

1.11.6.13 PREVENTION OF LOSSES TO THE TREASURY

1.11.6.13.1 To prevent situations that generate losses to the treasury, public agents must adopt the following conducts:

- a) Do not facilitate or engage to:
 - incorporate, into the assets of a private individual or legal entity, the assets, income, funds, or values that are part of the assets of the companies of the CAIXA Conglomerate;
 - incorporate, into the assets of a private individual or legal entity, the assets, income, funds, or values that have been transferred by the public administration to private entities by means of signed partnerships without complying with applicable legal or regulatory formalities for such action.
- b) Do not allow or engage in such a way that:
 - a private individual or legal entity uses the assets, income, funds, or values that are part of the assets of the companies of the CAIXA Conglomerate without complying with applicable legal or regulatory formalities for such action;
 - a private individual or legal entity uses the assets, income, funds, or values that have been transferred by the public administration to private entities by means of signed partnerships without complying with applicable legal or regulatory formalities for such action.
- c) Do not donate, to an individual or legal entity, as well as to a depersonalized entity, even for educational or assistance purposes, the assets, income, funds, or values that are part of the assets of the companies of the CAIXA Conglomerate without complying with applicable legal or regulatory formalities for such action;
- d) Do not allow or facilitate, outside of legal circumstances, the sale, exchange, or rental of an integral asset that is part of the assets of the companies of the CAIXA Conglomerate, or offer services on behalf of said companies, at a price that is lower than the market price;
- e) Do not allow the acquisition, exchange, or rental of goods or services at a price that is higher than the market price;

- f) Do not execute financial transactions without complying with legal and regulatory standards or accepting insufficient or unsuitable guarantees;
- g) Do not grant administrative or tax benefits without complying with legal or regulatory formalities applicable for such action;
- h) Do not disrupt the lawfulness of a bidding or selection process for signing partnerships with non-profit entities, or unduly dismiss them;
- i) Do not request or approve expenses not authorized by law or regulation;
- j) Do not act in a negligent manner when collecting taxes or income, as well when conserving public assets or when signing, inspecting, and analyzing the accounts of partnerships signed by the public administration with private entities;
- k) Do not release public funds without strict compliance with applicable rules or influence, in any way, the irregular release of said funds;
- l) Do not allow, facilitate, or engage in the illicit enrichment of third parties;
- m) Do not allow the use, in private works or services, of vehicles, machinery, equipment, or material of any nature that is owned by or made available to any of the companies of the CAIXA Conglomerate, as well as for the work of public servants, employees, or third parties hired by said companies;
- n) Do not sign a contract or other legal instrument whose purpose is to provide public services through associated management without complying with the formalities provided by law;
- o) Do not sign a public consortia apportionment contract without having sufficient and prior budget allocation and without complying with the formalities provided by law;
- p) Do not sign public administration partnerships with private entities without complying legal or regulatory formalities applicable to such action.

1.11.6.14 PREVENTION OF ACTS THAT HARM DOMESTIC OR FOREIGN PUBLIC ADMINISTRATION

1.11.6.14.1 To prevent situations that constitute as acts that harm domestic or foreign public administration, public agents must adopt the following conducts:

- a) Do not promise, offer, or give, directly or indirectly, an undue advantage to a public agent or third party related to him/her;
- b) Do not finance, fund, sponsor, or in any way subsidize the practice of illegal acts provided for by law;
- c) Do not jeopardize the investigation or inspection activities of public bodies, entities, or agents, or intervene in their activities, including within the scope of regulatory agencies and supervisory bodies of the national financial system;
- d) Do not disrupt or defraud, by means of adjusting, combining, or engaging in any other action that harms the competitive nature of a public bidding process;
- e) Do not prevent, disrupt or defraud the performance of any public bidding process;
- f) Do not remove or seek to remove a bidder, through fraud or by offering any type of advantage;
- g) Do not defraud public bids or contracts arising therefrom;
- h) Do not establish, in any way, a legal entity to participate in a public bidding process or to sign an administrative contract;
- i) Not obtain undue advantages or benefits in a fraudulent manner by means of modifying or extending contracts signed with the public administration, without being fully authorized by law, when calling public bids or in their respective contractual instruments;
- j) Do not manipulate or defraud the economic-financial balance of contracts signed with the public administration.

1.11.6.15 RECEIVING AND OFFERING OF PRESENTS AND GIFTS

1.11.6.15.1 Public agents, due to the nature of their duties, must not accept favors, commissions, gratuities, financial or material advantages, donations, presents, or gifts of any nature, for themselves or others, offered directly or indirectly, resulting or not from relationships with CAIXA and that may influence decisions, facilitate business, benefit third parties, or cause damage to the Company's image. Therefore, to prevent situations that can be characterized as deviations from ethical conducts or inadequate professional and personal conduct, public agents must comply with the following actions:

- a) Do not accept personal invitations for trips, accommodation, and other attractions offered to a public agent, his/her spouse, partner, or relative, in a direct or collateral line, by blood or affinity, up to the third degree;

- b) Do not accept gifts of any value, due to the position or role held by public agents, when the offeror is a person, company, or entity that:
- has personal, professional, or institutional interest in a decision that can be taken by a public agent, either individually or collectively, due to his/her position;
 - is offered by an individual or legal entity that has a relationship with CAIXA and which may constitute as an improper relationship, cause financial losses, or damage CAIXA's reputation;
 - maintains a commercial relationship with CAIXA and its subsidiaries;
 - represents the interest of third parties, as an attorney or representative of individuals, companies, or entities included in the previous items.
- c) Do not accept invitations or tickets to entertainment activities such as shows, plays, presentations, and sporting events;

1.11.6.15.2 For the purposes of this Code of Conduct, the following items shall not be considered as presents if or gifts:

- a) a cash prize or item granted by an academic, scientific or cultural entity, in recognition of intellectual contribution;
- b) a prize granted as a result of a public competition of academic, scientific, technological, or cultural nature;
- c) a scholarship linked to professional or technical development, provided the sponsor does not have interest in a decision that can be taken by a public agent due to his/her position;
- d) an award granted by CAIXA or its related companies, subsidiaries, and partners in recognition of performance in obtaining business results, provided it has been previously established in an incentive campaign and approved by CAIXA's decision-making bodies.

1.11.6.15.3 Items or expenses for transportation, meals, accommodation, courses, seminars, congresses, events, fairs, or entertainment, granted by a private agent to a public agent resulting from his/her duties but not involving the exercise of an institutional representation, shall be considered gifts.

1.11.6.15.4 Gifts that are received in protocol, when a public agent is representing CAIXA and there is reciprocity, shall be allowed.

1.11.6.15.5 If, for any reason, a gift cannot be refused or returned without incurring costs to a public agent, one of the following measures must be adopted according to the type of good received:

- a) if the gift is of historical, cultural, or artistic value, it shall be incorporated into CAIXA's cultural collection;
- b) the gift may be sent to the National Historical and Artistic Heritage Institute – IPHAN for its appropriate legal destination;
- c) in other situations, promote the donation of non-perishable gifts to a charity or philanthropic entity, who shall recognize the item as being of public use and commit to using the donated good or product it in their end activities;
- d) gifts of perishable nature must also be donated to a charity or philanthropic entity, who shall recognize the donated good or product as being of public use and shall be consumed by said entity.

1.11.6.15.6 The gifts that are incorporated into a historic and cultural artistic collection, or donated to a charity or philanthropic entity, shall be recognized as being of public use and must appear on the Access to Information page, for control purposes.

1.11.6.15.7 Public agents may accept invitations or tickets to entertainment activities such as shows, plays, presentations, and sporting events when it is related to the exercise of an institutional representation, however the invitation or tickets may not be transferred or used by third parties outside the Institution.

1.11.6.15.8 Public agents may accept invitations or tickets to entertainment activities such as shows, plays, presentations, and sporting events when said invitations or tickets originated from public promotions or sweepstakes, from a private consumer relationship that is not connected, in any way, with a public agent's status, and when the invitations or tickets are distributed by a public body or entity from any sphere of power, so long as their economic value is within the limit set by the Public Ethics Commission.

1.11.6.15.9 Public agents may accept invitations or tickets for entertainment activities, such as shows, presentations, parties, carnival parades, and sporting events promoted or sponsored by CAIXA, provided that the unit promoting the event defines the distribution criteria for invitations and tickets to public agents.

1.11.6.15.10 CAIXA Directors must disclose information regarding their participation in events and activities paid by third parties in their work agendas.

1.11.6.15.11 Gifts may be accepted if they:

- a) have no commercial value;

- b) are distributed, by any type of entity, as a courtesy, marketing campaign, regular publicity, at special events, or on commemorative dates of historical or cultural nature, so long as their economic values do not exceed the amounts set by a Resolution from CEP or another authority;
- c) have a distribution periodicity of no less than 12 months;
- d) are general items and, therefore, are not intended to exclusively benefit a specific public agent.

1.11.6.15.12 If there are doubts as to whether the gift has a commercial value, public agents should carry out a market assessment and, if deemed appropriate, immediately treat the item as a gift.

1.11.6.16 RELATIONSHIP WITH CLIENTS, SUPPLIERS, PARTNERS, UNITS OF THE CAIXA CONGLOMERATE, AND PUBLIC AGENTS OF BODIES/ENTITIES AND OTHER INSTITUTIONS

1.11.6.16.1 Relationships with clients, suppliers, partners, units of the CAIXA Conglomerate, and with public agents of bodies/entities and other institutions are guided by ethical and socially responsible values, established by CAIXA, particularly within the scope of this Code, thus avoiding situations that could characterize a conflict of interest, which is why public agents must adopt the following conducts:

- a) Do not make professional contacts with representatives of suppliers, service providers, sponsored entities, companies, or clients without being accompanied by a second employee, appointed by the immediate supervisor and, if the public agent is a statutory director, he/she shall be accompanied by another director, statutory member or employee;
- b) Do not hold meetings with clients at CAIXA's headquarters or working units without the presence of representatives from other areas when dealing with a client or business that is managed or has a mandate under another area;
- c) Record all professional meetings with representatives of suppliers, service providers, sponsored entities, companies, or clients in the minutes of said meetings;
- d) Do not hold meetings with public agents of bodies/entities or with politically exposed persons without being accompanied by another employee, director, or member of a statutory body and, if the host, public agent of the bodies/entities, or politically exposed person does not allow the presence of all the designated CAIXA representatives, this fact must be recorded in the minutes of said meetings;
- e) Act with impartiality and professionally, rejecting any attempt or even appearance of favoritism when dealing with suppliers;
- f) Communicate with suppliers in a clear and objective manner, using all available corporate means and channels;
- g) Maintain a cooperative and balanced relationships with clients and users;
- h) Offer fair and equitable treatment to all clients and users;
- i) Provide information to clients and users in a clear and precise manner regarding products, services, and how personal data is processed by CAIXA;
- j) Meet client and user demands in a timely manner;
- k) Strive to avoid all unreasonable barriers, criteria, or procedures for terminating contractual relationships for products and services, as well as for transferring the relationship to another institution at the client's request.

1.11.6.17 USING, DISCLOSING AND REPORTING INFORMATION

1.11.6.17.1 For the appropriate use and disclosure of information from the CAIXA Conglomerate, and to preserve its confidentiality, notwithstanding compliance with policy PO061, public agents must adopt the following conducts:

- a) Keep confidential data, including personal data and sensitive personal data, information, and operations relating to CAIXA, its clients, affiliated or subsidiary companies, service providers, suppliers, or companies/entities that participate as representatives of CAIXA in funds, statutory bodies, councils, or committees, which has not yet been made public but that public agents are aware due to their professional activities, observing any legal conditions or judicial determination received by CAIXA's legal department;
- b) Obtain prior and express authorization from the product or service management area to publish studies, opinions, research, or any other work of private nature that includes restricted or confidential matters and/or information;
- c) Communicate any privileged information that may become a material act or fact to the Vice President responsible for the area that communicates with the market and society in general, observing the duties of said area and possible segregation of activities;
- d) Do not use privileged information obtained within the scope of a public agent's activities or role a representative in funds, statutory bodies, councils, and committees for personal benefit or to benefit relatives, friends, or third parties;

- e) Do not disseminate to the press or make available to third parties any confidential or privileged information regarding a material act or fact for CAIXA which has not yet been officially disclosed through the Institution's channels, which shall be characterized as leakage of information;
- f) Do not disseminate defamatory information or communicate to the public any opinion or concerns regarding the integrity, morality, clarity of positions, and decorum of an employee or director;
- g) Do not provide access to information systems, operations, and databases under the responsibility and/or property of CAIXA to third parties, unless expressly authorized by the competent manager;
- h) Do not use access to privileged information to obtain personal advantages or to benefit third parties, particularly for trading securities issued by CAIXA, taking responsibility for preventing, within the scope of the public agent's activities, investors from being harmed by the practice of insider trading.

1.11.6.18 USE OF CAIXA'S ASSETS

1.11.6.18.1 To prevent the situations of improper use of CAIXA's assets and assets, public agents must adopt the following conducts:

- a) Ensure that public assets are protected through the appropriate use of information, assets, equipment, and other resources made available to effectively manage the business transactions carried out on behalf of CAIXA.
- b) Do not use material resources, communication channels, and facilities made available for purposes other than professional activities;
- c) Do not use technologies, methodologies, models, know-how, and other information owned by CAIXA or developed or obtained by the Institution, for private purposes or to be shared with third parties, even a public agent has participated in its development.

1.11.7 SPECIFIC CONDUCT STANDARDS

1.11.7.1 Public agents, when carrying out activities regarding the administration and management of third-party assets, risk, treasury operations, typical investment banking transactions, issuing of public offerings by the issuer or offeror, notwithstanding the application of the General Conduct Standards provided in this Code, must comply with the regulatory, self-regulatory and internal standards to which they are subject.

1.11.7.2 In the event of any administrative procedure aimed at investigating situations that could result in a conflict of interest or non-compliance with rules or laws, directors and members of statutory bodies shall authorize access to their tax, banking, telephone, and other relevant data object of the investigation when requested by the authority responsible for initiating the administrative proceedings, within the strict limits of what is necessary to clarify the facts.

1.11.7.2.1 The information obtained shall remain confidential and will not be revealed without the consent of the interested parties, except in cases authorized by law.

1.11.7.3 The director and member of a statutory body who maintain an equity stake greater than five percent of the share capital of any company must inform this fact to the Public Ethics Commission.

1.11.7.4 The director and member of a statutory body who receives a salary or any other remuneration from a private source must inform this fact to the Public Ethics Commission, except for remuneration arising from his/her participation in boards and councils of companies in which CAIXA holds an equity stake or the right to appoint representatives, or prizes received from CAIXA, its related companies, subsidiaries, and partners as described in this Code.

1.11.7.5 During the exercise of their mandates, directors and members of statutory bodies must adopt the following conducts:

- a) Do not invest in assets whose value or price may be affected by government policy or decisions, or by commercial relationships maintained by CAIXA to which they have access to privileged information arising from their positions as directors and members of statutory bodies;
- b) Do not use privileged information for any purpose, or take advantage of the position as director and member of a statutory body for personal benefit or to benefit third parties;
- c) Do not comment with third parties on internal matters involving confidential information or that may anticipate market behavior;
- d) Do not use or disclose, at any time, for personal advantages or to benefit third parties, any privileged information obtained as a result of the activities carried out, even after being dismissed from the activities of director and member of a statutory body;
- e) Do not receive transportation, accommodation, or any personal favors from individuals that may give rise to concerns about the probity or honorability of the director and members of statutory bodies;
- f) Do not use team members to address private matters.

1.11.7.5.1 In relation to personal investments, directors and members of statutory bodies must also comply with CVM Resolution 44, of August 23, 2021, and future resolutions that may replace and/or complement it, as well as the guidelines issued by the CCAAF and the provisions of Resolution 15, of February 1, 2020.

1.11.7.5.2 In relationships with other public and private bodies, companies, and other entities, directors and members of statutory bodies must clarify the existence of any conflict of interest, in addition to communicating to the collegiate body any circumstance or fact that impedes them from participating in a collective decision or in a collegiate body.

1.11.7.5.3 Any disagreements between directors and members of statutory bodies shall be resolved internally, through administrative coordination, and they must not express their opinions publicly on matters that do not affect their area of competence.

1.11.7.6 Directors and members of statutory bodies must keep privileged information and material acts or facts to which they have access arising from their position or role confidential until such information has been effectively disclosed to the market.

1.11.7.6.1 Directors and members of statutory bodies must disclose and archive, in the respective Consultancies, the agendas of meetings and encounters with individuals and legal entities that have any type of interest in CAIXA, keeping a summary record of the matters discussed, the name of the employee who accompanied the meeting and a list of the meeting's participants, which shall be made available to the interested parties.

1.11.7.7 During the exercise of their mandates, directors and members of statutory bodies must adopt the following conducts:

- a) Do not provide public opinions regarding the honorability and functional performance of other members or public federal authorities;
- b) Do not provide public opinions regarding the merits of a matter that will be submitted for an individual decision by a director or member of a statutory body or that must be decided by a collegiate body;
- c) Protect the confidentiality of information relating to a material act or fact to which a director or member of a statutory body has privileged access due to their roles or public jobs until the matter has been disclosure to the market;
- d) Report awareness on any material act or fact to CAIXA's Investor Relations Officer, who shall be responsible for its disclosure and, in the event said Officer omits the information, report to matter the Brazilian Securities and Exchange Commission – CVM; and
- e) Do not disclose, without authorization from the competent body at CAIXA, information that may impact the price of the Company's securities and its relations with the market, consumers, and suppliers.

1.11.7.8 Proposals for future work or business in the private sector aimed at directors and members of statutory bodies, as well as any negotiations that constitute a conflict of interest, must be immediately reported to the Public Ethics Commission, regardless of if the proposals have been accepted or rejected.

1.11.7.8.1 After leaving the position of director and member of a statutory body, said individuals must not engage in any type of professional activity that could potentially give rise to a conflict of interest with CAIXA's activities within a period of six months.

1.11.7.8.2 During a period of six months from the date of dismissal, exoneration, discharge, or retirement from the position of director and member of a statutory body, the following conditions shall constitute a conflict of interest, except when expressly authorized by the Public Ethics Commission:

- a) provide, directly or indirectly, any type of service to an individual or legal entity with whom a director or member of a statutory body have established a relevant relationship due to their positions at CAIXA;
- b) accept a position as administrator or advisor, or establish a professional relationship with an individual or legal entity that performs activities related to the same area of competence of the previous position held by the director;
- c) sign service, consultancy, advisory, or similar contracts with the companies of the CAIXA Conglomerate;
- d) intervene, directly or indirectly, in favor of a private interest before CAIXA or a body in which a relevant relationship had been established due to the exercise of a director position.

1.11.7.9 In addition to the measures described in this Code, directors and members of statutory bodies may prevent a conflict of interest by adopting the following measures within six months from the publication of this Code:

- a) transfer the management of assets and rights that may give rise to a conflict of interest to a financial institution or securities portfolio manager authorized to operate by BACEN or CVM, as applicable, through a contractual instrument that includes a clause stating that individuals who are directors and members of statutory bodies are prohibited from participating in any investment decision, as well as due to their prior knowledge of decisions taken by the managing institution regarding the management of assets and rights.

1.11.7.10 All directors and members of statutory bodies, upon taking office, must sign a term of acknowledgment and agreement with the standards established by the Code of Conduct for Senior Federal Administrators (file attached to the standard) and by this Code.

1.11.7.11 Directors and members of statutory bodies may clarify their questions and request additional information with the Public Ethics Commission.

1.11.7.12 Directors and members of statutory bodies must refrain from providing consultancy, advisory, technical assistance and training services, except for teaching activities and situations provided herein.

1.11.8 FINAL PROVISIONS

1.11.8.1 Violations of this Code committed by an employee are subject to the opening of a proceeding to determine disciplinary and civil liabilities, or an ethical investigation process.

1.11.8.2 Violations of this Code committed by the President, Vice Presidents, directors, and members of statutory bodies shall be submitted for consideration by the Board of Directors, except for situations within the scope of the Public Ethics Commission of the Presidency of the Republic.

1.11.8.3 Holding a public agent accountable in a situation of conflict of interest is considered administrative improbity, as provided in Law 12,813/2013.

1.11.8.4 Managers are responsible for keeping employees duly informed and aware of the content of this Code, guiding them on the need to read and constantly reflect on requirements established herein.

1.11.8.5 This Code must be included as an attachment in CAIXA's service contracts to also guide the conduct of service providers.

1.11.8.6 The Board of Directors is responsible for discussing, approving, and monitoring decisions relating to CAIXA's Code of Ethics, Conduct and Integrity.

1.11.8.7 CAIXA's Internal Affairs Department will prepare, make available and keep updated "Questions and Answers", "Booklet" (file attached to the standard) and "Guidelines" on the topics covered in this Code.