

Banco Sumitomo Mitsui Brasileiro S.A.

I. Objective

The Social, Environmental and Climate Responsibility Policy ("PRSAC" or "Policy") presents the guidelines related to sustainability and social, environmental and climate responsibility, adopted by Banco Sumitomo Mitsui Brasileiro S/A, its subsidiaries and/or dependencies ("SMBCB"), in accordance to National Monetary Council ("CMN") Resolution No. 4,557, of February 23, 2017, as amended, and CMN Resolution No. 4,945, of September 15, 2021 ("Resolution 4,945").

II. Introduction

This Policy presents the guidelines that must be followed in the conduct of business, processes and activities, observing principles of relevance and proportionality.

- Climate: positive contributions to measures of transition to a low-carbon economy and reduction of impacts caused by frequent and severe weather by changes in weather patterns;
- Social: the respect, protection and promotion of fundamental rights and guarantees and of common interest; and
- Environmental: preservation and repair of the environment, including its recovery, when possible.

III. Guidelines of Conduct

- Compliance with related laws and regulations;
- Respect for human rights, the environment and ethical principles throughout business activities and in the work environment;

- Adoption and incorporation (observing principles of relevance and proportionality to the business model, the nature and complexity of operations, products, services and processes) of principles and guidelines related to Social, Environmental and Climate Responsibility to the Governance structure; the employee evaluation process; Risk Management and Monitoring processes; the relationship processes with customers, suppliers and relevant stakeholders; the processes of developing, approving and reviewing business activities;
- Disclosure of information as set forth in internal policies and regulatory requirements;
- Promotion of employee education on PRSAC and social, environmental and climate principles;
- Incorporation of practices of social responsibility and protection of impacts to the environment and climate decision-making processes related to the admission and monitoring of customers, suppliers and relevant stakeholders, observing principles of relevance and proportionality; applying restrictive measures if deemed necessary in the assessment procedure;
- Incorporation of social responsibility practices and protection of environmental and climate impacts in decision-making processes related to the evaluation of counterparties and approval of financial and credit operations, observing mitigators and principles of relevance and proportionality;
- Application of restrictive measures for activities related to the financing of construction projects or expansion of coal-fired power plants.

IV. Governance

IV.A. Board of Directors

Board of Directors is responsible for, without prejudice to the other attributions established in Resolution 4,945, to define the strategy, revise, approve and promote the dissemination of the Social, Environmental and Climate Responsibility Policy (PRSAC), acting in such a way as to ensure its adherence and compatibility with other policies, to ensure the implementation of corrections and improvements in case of deficiencies pointed out; analyze results of related analyses and monitoring for consideration, including in decision-making processes.

IV.B. Product Department

Product Department is responsible for the incorporation of principles and guidelines related to Social, Environmental and Climate Responsibility in the evaluation and review of new products, services and projects.

IV.C. Risk Department

The Risk Officer is responsible for the attributions described in Article 5 of Resolution 4,945, namely:

- (i) provide of support and participation in the decision-making process related to the establishment and review of PRSAC, assisting the Executive Board;
- (ii) implementation of actions aimed at the effectiveness of PRSAC;
- (iii) monitoring and evaluation of the actions implemented;
- (iv) improvement of the implemented actions, when any deficiencies are identified; and
- (v) adequate and reliable disclosure of information intended for the external public, in a single and easily identifiable place on the SMBCB website, in the manner established by Resolution 4,945.

The Risk Department is responsible for supporting the Risk Officer in his duties, for integrating and coordinating, together with the relevant areas, implementation, identification, diagnosis, monitoring, analysis, preparation and dissemination of reports; investigation, analysis and disclosure of occurrences related to socio-environmental and climate risks in order to support the processes of monitoring, elaboration of policies and procedures and information required in decision-making processes, according to the PRSAC guidelines.

IV.D. Human Resources Department

Human Resources Department is responsible for coordinating the employee evaluation process, incorporating PRSAC guidelines.

IV.E. Internal Audit Department

Internal Audit Department is responsible for verifying compliance with policies and adherence of procedures and processes to PRSAC guidelines.

IV.F. Compliance Department

Compliance Department is responsible for incorporating PRSAC guidelines and policies associated with the due diligence processes of customers, partners and suppliers, providing information support, in an integrated manner to the Risk Department, whether during admission or review to maintain relationships with customers, suppliers and other relevant stakeholders.

IV.G. Legal Department

Legal Department is responsible for providing technical support on: specific themes, evaluations and definitions, guidance regarding compliance with contractual, documentary and applicable law requirements; preparation of documents, according to the guidelines established in PRSAC and institutional policies.

IV.H. Risk Committee

Composed of the Board of Directors of SMBCB, with a minimum annual frequency, its attributions include the supervision, in a comprehensive and integrated manner, of adherence to policies, the analysis of relevant aspects in risk management and the definition of actions and strategies, in coordination with other committees, forums and other monitoring and deliberation platforms related to social risks, environmental and climate, as set forth in SMBCB's corporate governance.