

POLICY

#SYSTEMIC

*Social, Environmental
and Climate
Responsibility Policy*
(Sustainability Policy)

Area: Sustainability Management

*Subject: Social, Environmental and Climate
Responsibility - Sustainability*

Scope: Systemic





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1. Purpose

Establish governance for sustainability, principles and guidelines of a social, environmental and climate nature, applicable to all levels and Entities at Sicredi, in order to steer decision-making in conducting business, in establishing financial and non-financial solutions, activities, processes and in the relationship with our stakeholders.



2. Definitions



Social Nature: it is based on respecting, protecting and promoting the fundamental rights and guarantees of employees, associates and other stakeholders, with a focus on the social development of communities.



Environmental Nature: it is based on preserving and repairing the environment, including its recovery, whenever possible.



Climatic Nature: it is any and all positive contributions to issues related to the climate crisis.



Economic Nature: offer financial and non-financial solutions with local impact in a genuine, prosperous and sustainable way.



Stakeholders: our employees, associates, suppliers, service providers, partners, communities where we operate, regulatory and class institutions, multilateral organizations, as well as other stakeholders identified by the System Entities.



Materiality of Sustainability at Sicredi: it defines the relevant themes to guide Sustainability Management, based on the dual materiality approach, which considers the potential impacts (positive or negative) that Sicredi may generate, as well as the risks and opportunities related to sustainability arising from the external environment.



Sustainability¹ at Sicredi: it is understood as a strategic commitment focused on the long-term viability of the business. Its management style is cross-functional and focuses on value

¹ For the purposes of CMN Resolution 4,945/2021, we consider the dimensions of responsibilities of a social, environmental and climate nature as sustainability.



creation through the expansion of positive impacts — economic, social, environmental, and climate-related — for members, employees, communities, and other stakeholders.



3. Guidelines

3.1. Policy Guidelines

3.1.1. Act with social, environmental and climate responsibility, based on our values, guidelines and strategic goals, compliance with the laws and regulations that rule the matter, in addition to the covenants and commitments undertaken voluntarily, as described below:

- a) Principles of the United Nations (UN) Global Compact;
- b) The UN 2030 Agenda, which establishes the Sustainable Development Goals – SDGs;

3.1.2. Establish our business, financial and non-financial solutions, activities, and processes guided by the Sustainability Strategy and our materiality, which help us put our mission into practice and allow us to direct our efforts towards priority sustainability issues and the achievement of our purpose;

3.1.3. Reinforce the essence of cooperativism in business, showing a real interest in the prosperity of members and promoting positive changes through local and sustainable development;

3.1.4. Introduce the precautionary principle when making decisions, seeking solutions that bring mutual benefits and minimize negative impacts on business, Sicredi's reputation and stakeholders;

3.1.5. Drive our actions with transparency, promoting dialogue with all stakeholders through appropriate channels and reporting applicable decisions and activities, aiming to strengthen bonds of trust and reciprocity;

3.1.6. Respect and protect human rights, by promoting inclusion, diversity and equity in our relationships with all stakeholders, as well as by rejecting conduct that may constitute moral and sexual harassment, discrimination, people's privacy violation, violation of rights of any nature and degrading work (child, forced or similar to slavery);



3.1.7. Seek, through our operations, to generate positive changes in economic, social, environmental and climate terms in the lives of our associates and communities in which we operate, contributing to the construction of a more prosperous society;

3.1.8. Act in compliance with the regulatory environment;

3.1.9. Promote intercooperation and relations with competitors and other stakeholders based on ethics, integrity and respect, trying to contribute to the strengthening of credit cooperatives and an integral financial system that fosters best sustainability practices;

3.1.10. Consider the social, environmental and climate impacts of our financial and non-financial solutions, activities, processes and in the relationship with our stakeholders, trying to reduce adverse impacts and enhance positive impacts;

3.1.11. Manage economic, social, environmental and climate opportunities and challenges, taking into account guidelines aligned with the best national and international sustainability and governance practices, with applicable regulations and with internal strategies;

3.1.12. Operate in an eco-efficient manner, trying to minimize adverse impacts on the environment, through the adoption of best practices for sustainable construction, greenhouse gas emissions management, and solid waste management;

3.1.13. Seek business opportunities and the development of products that take aspects of a social, environmental and/or climate nature into consideration, aligned with our internal guidelines and current regulations that contribute to the transition to a low-carbon economy;

3.1.14. Support our associates in reducing their adverse environmental and social impacts, through financial and non-financial solutions with sustainability attributes;

3.1.15. Adopt measures to mitigate risks and enhance opportunities and innovations that promote the sustainable use of resources, conservation and the protection of Brazilian biodiversity;

3.1.16. Stimulate local development in the communities where we operate, through social investment in areas that are fundamental for positive social transformation, such as education, culture, health, sports, leisure, the environment, among others;



3.1.17. Promote financial well-being, through inclusion and financial education, in order to develop conscious citizens and financial behaviors that lead to a more sustainable financial life;

3.1.18. Establish practices and processes for continuous improvement of data privacy, accessibility, social inclusion and respect for human rights, ensuring diversity and equity in opportunities and in participation within Sicredi, as well as access to inclusive products and services for our employees, associates, suppliers, partners and other stakeholders;

3.1.19. Engage our value chain, including our suppliers and partners, in adopting best practices in social, environmental, and climate responsibility, with the goal of strengthening sustainability, promoting continuous improvement, and mitigating risks;

3.1.20. Train and engage our employees and other stakeholders on sustainability-related topics, as applicable;

3.1.21. Boost the expansion and evolution of educational, social, cultural and environmental programs and initiatives to increase the positive impact on communities;

3.1.22. Strengthen the cooperative governance model, the participation of members in the Cooperative's decisions and the maintenance of the cooperative nature of our System.

Important



In order to support the implementation of the Social, Environmental and Climate Responsibility Policy – PRSAC (Sustainability Policy), we have a set of **Sustainability Guidelines** for the business, which are systemic, internal, and organized by theme. The Guidelines aim to guide Sicredi towards best practices in addressing the main challenges related to sustainability, and are available on our internal regulations page.

3.2. Governance

3.2.1 Sustainability is a cross-cutting theme managed by the Executive Superintendency of Strategy and Marketing, located at the Sicredi Administrative Center (CAS - Centro Administrativo Sicredi) and implemented under the responsibility of all Entities that are part of Sicredi.



3.2.2. The governance structure for social, environmental and climate responsibility is proportionate to our size and business model, the nature of our operations, the complexity of our financial and non-financial solutions, activities, processes and aligned with the dimension and relevance of our exposure to social, environmental and climate risks.

3.3. Governance for Sustainability

3.3.1. It is made up of two structures with different responsibilities, one structure for decision-making and the other to ensure the implementation of the theme.

I. Decision-making structure:

Responsible for the Systemic decision-making process regarding the Social, Environmental and Climate Responsibility Policy – PRSAC (Sustainability Policy) and Sustainability Strategy:



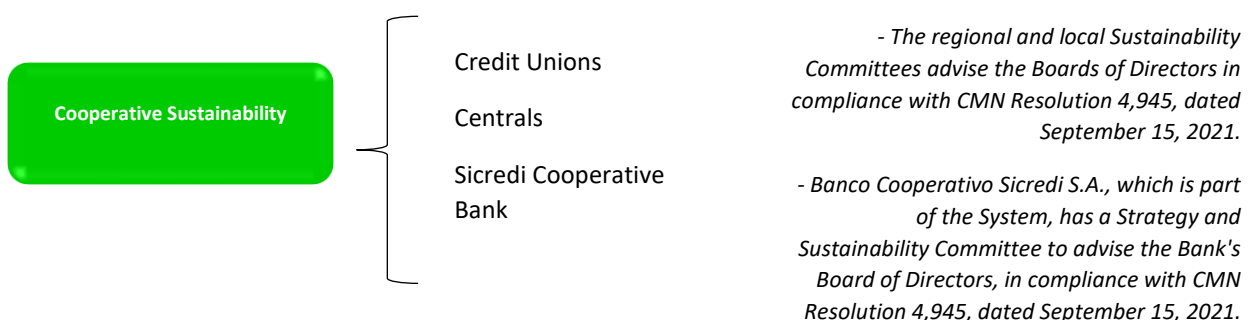
**Strategy and Sustainability Committee – Advisory Committee to SicrediPar's Board of Directors, in compliance with CMN Resolution 4,945, dated September 15, 2021.*

***Board of Directors of Sicredi Participações S/A – SicrediPar.*

3.3.2. On an extraordinary basis, i.e., whenever necessary, the committees responsible for social, environmental and climate responsibility and risk guidelines meet jointly to align converging guidelines, seeking to facilitate the exchange of information, with the aim of advising SicrediPar's Board of Directors. It is recommended that this practice be adopted, according to the corresponding structures in the entities responsible for implementing this policy.

II. Implementation structure:

Responsible for ensuring the implementation of the Social, Environmental and Climate Responsibility Policy – PRSAC (Sustainability Policy) and the application of the Sustainability Strategy in all entities of the System.





Important



The Sustainable Development Framework and the Sustainability Data Management Dashboards are internal tools that support the monitoring and evaluation of the implementation of the Sustainability Strategy. These tools also enable the monitoring of the sustainability performance of each entity within the System, through their respective sustainability committees.

3.4. Materiality Review

3.4.1. The material themes that make up the Sustainability Strategy are periodically reviewed, with the aim of managing economic, social, environmental, climate and governance opportunities and challenges, aligned with the expectations and needs of our stakeholders, regulations, market developments and the demands of our business.



4. Responsibilities

4.1 Responsibilities related to this policy at the Systemic level²

4.1.1 It is incumbent upon SicrediPar's Board of Directors:

- a) Deliberate on this Policy, Sustainability Strategy and other issues related to sustainability at a systemic level;
- b) Ensure the application of this Policy, through compliance with the principles and guidelines in decision-making;
- c) Ensure the compatibility and integration of this Policy with other systemic policies;
- d) Promote the systemic dissemination of the Policy and actions with a view to their effectiveness.

² Within a systemic context, the cooperatives, central organizations, CAS companies, and Banco Sicredi conglomerate are considered.

**4.1.2. It is incumbent upon SicrediPar's Strategy and Sustainability Committee to:**

- a) Propose recommendations to Board of Directors at SicrediPar regarding the establishment and revision of the Social, Environmental and Climate Responsibility Policy – PRSAC (Sustainability Policy);
- b) Evaluate the degree of adherence of the implemented actions to the systemic Social, Environmental and Climate Responsibility Policy – PRSAC (Sustainability Policy) within the scope of action of SicrediPar Board of Directors and, when necessary, propose recommendations for improvement;
- c) Monitor Systemic performance in relation to sustainability, providing SicrediPar Board of Directors with analyses and information.

4.1.3. It is incumbent upon the Executive Director of the Sicredi Administrative Center to:

- a) Ensure the effective implementation of this Policy and actions aimed at its effectiveness, within the scope of their activities;
- b) Monitor and evaluate the implemented actions, directing improvements whenever necessary; Provide input and participate in the decision-making process related to the establishment and revision of the PRSAC, assisting the Board of Directors at SicrediPar; Ensure the correct dissemination of this Policy and other relevant information;
- c) Represent the Entity with the Central Bank for issues related to this Policy, within the scope of their activities.

4.1.4. It is incumbent upon the Executive Superintendency of Strategy and Marketing of the Sicredi Administrative Center to:

- a) Recommend systemic sustainability strategies and guidelines to the Strategy and Sustainability Committee;
- b) Ensure this Policy, its implementation and the Sustainability Strategy at a systemic level;
- c) Promote the systemic dissemination of the Policy and actions with a view to their effectiveness.

4.1.5. It is incumbent upon the Executive Board of the Sicredi Administrative Center to:



- a) Ensure the effective implementation of this Policy and actions aimed at its effectiveness, within the scope of their activities;
- b) Conduct their activities in accordance with this Policy and in line with the actions implemented with a view towards their effectiveness;
- c) Promote the systemic dissemination of the Policy and actions with a view to their effectiveness.

4.2. Responsibilities related to this policy within the Banco Sicredi conglomerate.³

4.2.1 It is incumbent upon the Board of Directors of Banco Sicredi to:

- a) Deliberate on this Policy, Sustainability Strategy and other issues related to sustainability within the Bank;
- b) Ensure the application of this Policy, through compliance with the principles and guidelines in decision-making within the Bank;
- c) Ensure the compatibility and integration of this Policy with other Bank policies;
- d) Promote the dissemination of the Policy and actions with a view to their effectiveness in the Bank.

4.2.2 It is incumbent upon the Strategy and Sustainability Committee of Banco Sicredi to:

- a) Propose recommendations to the Bank's Board of Directors regarding the establishment of the Social, Environmental and Climate Responsibility Policy – PRSAC (Sustainability Policy);
- b) Evaluate the degree of adherence of the implemented actions to the Social, Environmental and Climate Responsibility Policy – PRSAC (Sustainability Policy) within the scope of action of the Bank's Board of Directors and, when necessary, propose recommendations for improvement;
- c) Monitor performance in relation to sustainability, providing the Bank's Board of Directors with analyses and information.

³ Banco Sicredi Conglomerate: Insurance Broker, Property Management, Consortium Management.



Note: The responsibilities of the Executive Director of the Sicredi Administrative Center and the Executive Superintendency described in 4.1.3 and 4.1.4 also apply to the Bank and its Conglomerate.

4.3. Responsibilities related to this policy within the scope of Individual Cooperatives and Central Cooperatives

4.3.1 It is incumbent upon the Boards of Directors of Cooperatives and Central

Organizations to:

- a) Ensure the application of this Policy, through compliance with the principles and guidelines in decision-making;
- b) Ensure the compatibility and integration of this Policy with other local or regional policies;
- c) Promote the local or regional dissemination of the Policy and actions with a view to their effectiveness.

4.3.2 It is incumbent upon the Sustainability Committee of Cooperatives or Central

Organizations to:

- a) Propose recommendations to the Entity's Board of Directors regarding the establishment of the Social, Environmental and Climate Responsibility Policy – PRSAC (Sustainability Policy);
- b) Evaluate the degree of adherence of the implemented actions to the Social, Environmental and Climate Responsibility Policy – PRSAC (Sustainability Policy) within the scope of action of the Entity's Board of Directors and, when necessary, propose recommendations for improvement;
- c) Monitor performance in relation to sustainability, providing the Entity's Board of Directors with analyses and information.



4.3.3 It is incumbent upon the assigned Director of the Cooperative or Cooperative Central to:

- a) Ensure the effective local or regional implementation of this Policy and actions aimed at its effectiveness;
- b) Monitor and evaluate local or regional performance and implemented actions, directing improvement whenever necessary;
- c) Provide input and participate in the decision-making process related to the establishment and review of the PRSAC, assisting the Board of Directors of SicrediPar;
- d) Ensure the correct disclosure of this Policy and other relevant information;
- e) Represent the Entity before the Central Bank for matters related to this Policy.

4.3.4 It is incumbent upon the Executive Board of Cooperatives or Central Organizations to:

- a) Ensure the effective implementation of this Policy and actions aimed at its effectiveness, within the scope of their activities;
- b) Conduct their activities in accordance with this Policy and in line with the actions implemented with a view towards their effectiveness;
- c) Promote the systemic dissemination of the Policy and actions with a view to their effectiveness.

Important

The Social, Environmental and Climate Responsibility Policy (Sustainability Policy) is a public document and is available on Sicredi internal communication channels and [at Sicredi's website](#).

It may be reviewed at any time in the event of internal demands and/or legal updates, considering a maximum term (of validity) of 3 years, and the documentation relating to the establishment of the Policy and the implementation of actions with a view towards its effectiveness must be kept at the disposal of the Central Bank of Brazil, for five years.

The Compliance area of the Sicredi Administrative Center is authorized to automatically update this policy in cases of changes in the nomenclature of Directors, Board of Directors, or companies.

Issues related to the management of social, environmental and climate risks are presented in the Social, Environmental and Climate Risk Management Policy.



5. Regulatory Basis

CMN Resolution No. 4,945, dated 9/15/2021

SARB Normative Instruction No. 014/2014

CMN Resolution No. 4,943, dated 9/15/2021



6. Validity and Approval History

DATE	DESCRIPTION	APPROVED BY
7/30/2020	1st version – document creation	Board of Directors on 07/30/2020 in Minutes No. 150.
5/18/2022	2nd version – review and update of the document	Board of Directors on 5/18/2022 in Vote 004/2022
12/18/2024	3rd version – review and update of the document	Board of Directors on 12/18/2024 in Minutes No. 242, Vote 41/2024.
12/18/2025	4th version – review and update of the document	Board of Directors on 12/18/2025 in Minutes No. 189, Resolution 74/2025.

In case of doubts related to the content of this Policy, contact Sicredi's Sustainability Department by email: sustentabilidade@sicredi.com.br.