2018

Code of Ethics and Standards of Conduct

Ethics and Standards of Conduct

The world is in constant transformation, including people, groups and organizations. These transformations originate from facts in history responsible for paradigm shifts and technological advances that put us in the face of new challenges. Absolute truths give way to new possibilities, new models of interaction and new experiences. Transformations are generated by people and for people.

All of these movements are important to our Company, directly influence our daily lives and drive us towards development. Digital transformation, for example, impacts culture and is reflected in the lives of our internal and external customers, requiring the Bank to adopt a new operational strategy.

In order to follow this path of transformation with respect and responsibility, the Code of Ethics and the Rules of Conduct have become a fundamental instrument that guides us in making decisions, presenting suitable and balanced conduct and guaranteeing an integral, reliable and socially responsible work environment.

This code presents the values that permeate BB's culture in a conceptual and comprehensive manner, and these should guide our behavior and relationship with the different groups and segments of society in Brazil or abroad.

The Rules of Conduct, which are a reflection of the premises presented in the Code of Ethics, indicate the responsibilities of all employees in an objective and practical manner, including the Senior Management, emphasizing the credibility, reputability and continuity of our Organization.

The assumptions and guidelines contained in this document must be observed with attention, care and with a vision of protagonism, because the responsibility for its consolidation and dissemination belongs to all of us.

After all, we are all responsible for taking care of what is valuable to people.

BOARD OF DIRECTORS

Fabrício da Soller
President of the Board of Directors

Júlio César Costa Pinto
Vice-President of the Board of Directors

Daniel Sigelmann
Member of the Board of Directors

Luiz Serafim Spinola Santos
Member of the Board of Directors

Fabiano Felix do Nascimento
Member of the Board of Directors

Beny Parnes
Member of the Board of Directors

Marcelo Augusto Dutra Labuto
Member of the Board of Directors

EXECUTIVE BOARD

Marcelo Augusto Dutra Labuto
President

Antonio Gustavo Matos do Vale
Vice-President

Bernardo de Azevedo Silva Rothe
Vice-President

Gueitiro Matsuo Genso
Vice-President

João Pinto Rabelo Junior
Vice-President

José Eduardo Pereira Filho
Vice-President

Márcio Hamilton Ferreira
Vice-President

Tarcisio Hubner
Vice-President

Walter Malieni Junior
Vice-President



PURPOSE

Purpose – To care for what is valuable to people**.**

VISION

Vision – To be the company that provides the best experience for people's lives and promotes the development of society in an innovative, efficient and sustainable manner.

VALUES

Customer Focus – We are always attentive to what is valuable to our customers.

Innovation – We are driven by innovation and agents of transformation.

Ethics – We adopt ethics as the foundation of our business practice.

Protagonism – We take responsibility for undertaking solutions of excellence.

Reliability – We are committed to the transparency and soundness of our actions.

Efficiency – We optimize the resources available to create value for our stakeholders.

Public Spirit – We consider the collective interest in making our decisions.

1. Introduction

1.1. Banco do Brasil's Code of Ethics presents the Company commitments and guidelines regarding their relationship with the public.

1.2. The Standards of Conduct outline the duties and behavior expected in the workplace, facilitating the implementation of the commitments made in the Code of Ethics.

1.3. The documents are reviewed every three years or extraordinarily at any time.

1.4. Employees in Brazil, abroad, apprentices and interns confirm their awareness and agreement with the Banco do Brasil corporate ethics documents annually.

1.5. The Human Resources Directorship is responsible to propose the updating of the Code of Ethics and of the Standards of Conduct, and to provide the application of the documents.

1.6. The Board of Directors are responsible for approving the updating of the Code of Ethics and the Standards of Conduct.

1.7. All of the Banco do Brasil areas are responsible for guaranteeing the application of the Code of Ethics and of the Standards of Conduct within work conditions.

1.8. Currently, educational actions about the Code of Ethics and of the Standards of Conduct are available.

2. Target-Audience

2.1. The Code of Ethics and Standards of Conduct are applied:

2.1.1. to Senior Management - the Board, President, Vice Presidents and Directors, including at subsidiaries;

2.1.2. to employees in Brazil and abroad;

2.1.3. to interns, apprentices, managers and employees of contractors.

2.1.4. those which are carrying out or providing services in the name of Banco do Brasil or for Banco do Brasil.

3. Code of Ethics[1]

3.1. Clients and Users

3.1.1 We offer products, services and information for the needs necessary to clients and users of every area of the market, along with innovation, quality, and safety in a timely manner.

3.1.2. We are offering dignified, correct and equitable treatment, respecting the interests and rights of the consumer

3.1.3. We offer clear, reliable and timely information and guidance, to allow customers to make the best business decisions.

3.1.4. We stimulate the communication of clients and users with the Company and we consider their manifestations in the development and improvement of solutions in products, services and relationship, providing convergence of interests and the consolidation of the institutional image of credibility, safety and competence.

3.1.5. We ensure the confidentiality of bank information, except in cases provided for by law.

3.1.6. We do not impose barriers, criteria or procedures which make the termination of the contractual relationship relative to products and services difficult, as well as for the relationship transfer to another institution, upon request from the client.

3.1.7. We promote a cooperative and balanced relationship model with our clients.

3.2. Senior Management and Employees

3.2.1. We ensure the establishment of a respectful and healthy working environment, guiding the relationships between superiors, subordinates, peers and colleagues through respect and cordiality.

3.2.2. We reject behavior that may be classified as harassment of any kind.

3.2.3. We respect freedom of association and seek to reconcile the interests of the Company with the interests of employees and their representative bodies in a transparent manner, with negotiation as a permanent practice.

3.2.4. We ensure that each employee has access to information relevant to their privacy and the confidentiality of such information, except in cases provided for by law.

3.2.5. We encourage the self-development of staff, making adequate training for the performance of their activities in the environment of the organization available.

[1] If any point within the Standards should be in conflict with the local laws and customs, the local regulations shall apply.

3.2.6. We recognize, accept and respect the diversity of the group of people who maintain relationships with the Bank.

3.2.7. We encourage the internal sharing of the Ethical Code of Conduct, the Conduct Norms and the General Policies which regulate the behavioral aspects of the organization.

3.2.8. We reject illegal practices such as bribery, extortion, corruption, money laundering and financing of terrorism, in all their forms.

3.2.9. We value conversation, maintaining channels able to receive and process questions, reports, complaints and suggestions, as well as guaranteeing anonymity.

3.2.10. We consider the social and environmental impacts in planning our activities, business and administrative practices.

3.3. Suppliers

3.3.1. We adopt criteria for selection, recruitment and evaluation, impartially and transparently, to allow plurality and competition between suppliers.

3.3.2. We require, in our relationships with suppliers, safeguarding of legal limitations:

3.3.2.1. compliance with labor, social security and tax legislation;

3.3.2.2. The compliance of the legislation and relative regulations towards the prevention and fight against corruption;

3.3.2.3. not using child or slave labor;

3.3.2.4. the adoption of best practices for environmental preservation;

3.3.2.5. Not adopting the practice of acts of corruption against governments, public administration, Brazilian or foreign, across any of its spheres.

3.3.3. We require that the employees of service suppliers, while providing services to BB, are instructed to comply with the guidelines of this Code of Ethics.

3.3.4. We do not authorize the improper conducting of any business on behalf of Banco do Brasil to set up criminal or illegal acts, such as corruption, money laundering, financing of terrorism or fraud.

3.4. Shareholders, Investors and Lenders

3.4.1. We base the management of the Company on the principles of legality, impersonality, morality, transparency and efficiency.

3.4.2. We are transparent and agile in providing information to shareholders, investors and lenders.

3.4.3. We consider all information liable of disclosure, except for the restricted nature which puts the performance and institutional image under risk, or which is protected by law.

3.4.4. We prepare our financial statements in accordance with the law and with accounting principles and standards, to properly represent the results of operations, cash flows and the financial position of the Company.

3.4.5. We have adopted procedures and internal controls to ensure the detail, truthfulness and transparency of our financial statements.

3.4.6. We prevent transactions of parties related in conditions other than market ones.

3.5. Partners

3.5.1. We consider all social and environmental impacts in the forming of partnerships, agreements, memoranda of understanding and technical and financial cooperation with external, private or public entities.

3.5.2. We establish partnerships that ensure the same values of integrity, ethics, reputability and respect for the community and the environment.

3.5.3. We maintain business relationships with institutions that maintain practices for preventing and combating any unlawful activity, corruption, money laundering or financing of terrorism.

3.5.4. We orientate the Entities linked to Banco do Brasil to define their direction for the BB ethics principles, for their representatives to behave in accordance with these principles.

3.6. Competitors

3.6.1. We act with ethics, integrity and civility as a commitment in our relationships with the competition.

3.6.2. We exchange information with competition in a lawful, transparent and reliable manner while preserving the principles of banking confidentiality and the interests of the Company.

3.7. Governments

3.7.1. We are government partners in the implementation of socio-economic policies, projects and programs for the sustainable development of Brazil and the countries where we operate.

3.7.2. We articulate the interests and needs of the Brazilian Public Administration with the various economic sectors of the societies in which we operate.

3.7.3. We work with the government regardless of the ideological beliefs of its members.

3.7.4. We act in accordance with international guidelines regarding tax evasion, preventing and combating corruption, money laundering and financing of terrorism.

3.7.5 We repudiate any acts of corruption committed against Brazilian or foreign governments and public administration, at any level, such as:

3.7.5.1. guarantee, promise, offer or give, directly or indirectly, any undue advantage to a public servant, or any third party related to them;

3.7.5.2. finance, sponsor, or otherwise subsidize the practice of any unlawful act;

3.7.5.3. induce, perform or fail to take any action in violation of its legal obligation;

3.7.5.4. obtain, retain or direct any business improperly;

3.7.5.5. affect or influence any act or decision;

3.7.5.6. use any intermediary, individual or legal entity to conceal or disguise the interest or identity of the beneficiaries of the acts carried out;

3.7.5.7. frustrate, defraud, take advantage or unduly benefit, prevent, disrupt or manipulate the competitive nature of the bidding process;

3.7.5.8. hinder investigative or supervisory activities or intervene in their operations.

3.7.6. We do not finance political parties or candidates for public office in Brazil or in the countries in which we operate.

3.8. Communities

3.8.1. We value the ties established with the communities in which we operate and we respect their cultural values.

3.8.2. We recognize the importance of the communities to the success of the Company as well as the need to give part of the added value of the business back to the community.

3.8.3. We support sustainable development initiatives and participate in projects aimed at improving the social conditions of the population.

3.8.4. We ensure transparency in the financing of social actions.

3.8.5. We affirm our commitment to eradicating all forms of degrading labor: child forced and slave.

3.8.6. We adopt social responsibility premised on the definition of policies, standards and procedures aimed at preventing and combating corruption, money laundering and financing of terrorism.

3.9. Regulatory bodies

3.9.1. We work in accordance with the laws and other regulations of the Brazilian legal system and the countries where we operate.

3.9.2. We meet the deadlines established for requests originating from external regulatory and supervisory bodies, and internal and external audits.

3.9.3. We ensure complete, legitimate, objective, current and clear information in the reports and documents which are made available to regulatory organ bodies in various countries which we update, and in the other public announcements that we make.

4. Standards of Conduct[1]

4.1. General Aspects

4.1.1. It is obligatory from all to:

4.1.1.1. follow of the Code of Ethics and of Standards of Conduct, as well as observing the rules and the principles contained within the BB Policies in the Corporate Governance Code, and in the other internal regulations.

4.1.1.2. follow the rules and regulatory standards of Brazil, and of the countries where the BB is in force.

4.1.1.3. contribute to achieving the Purpose and Vision of Banco do Brasil.

4.1.1.4. practice corporate Values in daily activities.

4.1.1.5. Renounce criminal conduct that gives rise to revulsion or severe organizational and social disapproval, such as:

4.1.1.5.1. crimes against sexual freedom, including sexual harassment;

4.1.1.5.2. crimes against the financial system or against the Brazilian or foreign Government;

4.1.1.5.3. fraud and illegal acts;

4.1.1.5.4. providing a service based on the receipt of any value, reward, gift or premium;

4.1.1.5.5. submitting anybody to a condition analogous to slavery;

4.1.1.5.6. tax evasion and other tax crimes;

4.1.1.5.7. agiotage, unauthorized exchange or other crimes against the national financial system.

4.1.1.6. Refrain from practicing, facilitating or allowing acts that constitute tax evasion, money laundering, financing of terrorism or corruption, as well as the use of the Bank's products and services to practice these and other crimes.

4.1.1.7. Maintain a financial position compatible with your occupation and proven income.

4.1.1.8. Refrain from using subterfuge in order to simulate the range of results.

4.1.1.9. Ensure that all transactions and decisions are authorized by the body that has the authority and the responsibility for the decision.

---

[1] If any point within the Standards should be in conflict with the local laws and customs, the local regulations shall apply.

4.2. Conflicts of Interest

4.2.1. Exercise your duty impartially, not making use of your official status to gain an advantage for yourself or third parties.

4.2.2. Immediately report any conflict of interest, or the presumption of its existence, to a superior.

4.2.3. Refrain yourself of deliberating on matters on which you hold conflicting interests with the Bank or of decisions, control or settlement of business with the people below, as well as companies at which they appear as leaders or partners:

4.2.3.1. the employee himself;

4.2.3.2. the spouse or the staff member's partner;

4.2.3.3. the employee's immediate and extended relatives.

4.2.4. Declare yourself unable to conduct business with public officials with decision-making powers within government agencies and entities to whom you are related, as immediate or extended family, either by blood or affinity, to the third degree of kinship.

4.2.4.1. Relatives are considered: blood relatives - father, mother, son/daughter, grandfather/grandmother, grandson/granddaughter, great-grandfather/great-grandmother, great-grandson/great-granddaughter, brother/sister, uncle/aunt and nephew/niece. Affinity - father/mother in law, son/daughter in law, stepfather/stepmother, stepson/stepdaughter, brother/sister in law; or the grandfather/grandmother, grandson/granddaughter, great-grandfather/great-grandmother, great-grandson/great-granddaughter, uncle/aunt, nephew/niece of a spouse or partner.

4.2.5. Ensure that internal activities are confined to the business and interests of the Company.

4.2.6. Refrain from conducting external activities that might constitute prejudice or competition to the Company.

4.2.6.1. Report the exercise of any professional activity conducted in parrallel to your service at the Bank to a superior and consult or request authorization from the competent body.

4.2.7. Contribute, during your daily activities, to maintaining the secular, non-partisan character of the Company.

4.2.8. Ensure that there is no involvement of the Company's name in the exercise of your political rights.

4.2.9. Conduct your career at the Bank without the intermediation of third parties.

4.2.10. Only make a decision, in the name of the client, subject to formal authorization.

4.2.11. Do no develop business relationships with people and organizations involved in illegal activities.

4.2.12. In the exercise of activity related to the capital market, refrain from using privileged information about relevant acts or facts not yet disclosed in the market for your own benefit or that of third parties.

4.2.12.1. Any deliberation of the controlling shareholder, the General Meeting, the controller stakeholder, the General Meeting, the Board of Directors or any other act or fact occurring in the Bank's business, which may have significant influence in a measurable way:

4.2.12.1.1. In the quotation of the securities issued by the Bank or referenced thereto;

4.2.12.1.2. In the decision of investors to buy, sell or hold the Bank securities;

4.2.12.1.3. In the decision of the investors to exercise any rights inherent to the condition of the holder of the securities issued by or referenced by the Bank.

4.2.13. Avoid using employee status in order to obtain a monetary loan with the client, supplier or service provider.

4.3. Gifts and Favors

4.3.1. Refrain from soliciting or accepting, under any circumstances:

4.3.1.1. money;

4.3.1.2. gifts or freebies worth more than R$ 100.00;

4.3.2. Rejecting a gift, even if in the allowed value, its characteristic or circumstance indicates the intention to influence the impartiality of the decisive process.

4.3.3. Donating to the Banco do Brasil Foundation or the non-profit institution, a gift which doesn't adhere to the past requirements, but which have received due to the impossibility of immediate subsequent return.

4.3.3.1. Donations of these gifts and freebies must be reported to the Bank.

4.3.4. It is only permitted to receive monetary value, or a gift above the established limit, when it comes from the internal recognition program at the Bank and its affiliates.

4.3.5. In order to offer gifts in the name of the Bank for the public agent, observe the existing limits in the local legislation, the legislations which handle transnational bribery, and the rules and policies of the institution who receives the courtesy.

4.4. Working Environment

4.4.1. Comply with safety standards and contribute to the prevention of accidents.

4.4.2. Maintain suitable personal presentation for your position and the social and cultural standards of the community.

4.4.3. Prevent embarrassment and damage to one's own image and that of the Bank.

4.4.4. Refrain from consuming illicit drugs.

4.4.5. Refrain from immoderate consumption of alcoholic beverages.

4.4.6. Contribute to the smooth running of the workplace organization and control.

4.4.7. Act positively in the dynamics of dependable work and service provision.

4.4.8. Ensure your own professional development, corresponding to the learning opportunities offered by the Company.

4.5. Internal Relationships

4.5.1. Build relationships with colleagues based on respect and cordiality.

4.5.2. Refrain from making or repeating comments that might damage the harmonious coexistence of the workplace.

4.5.3. Refrain from making or publishing, in any internal or external medium, offensive criticism or slander that damages the image or respect of the Bank, its board of directors, superiors or colleagues.

4.5.4. Refrain from any conduct that may be considered as:

4.5.4.1. prejudice or discrimination;

4.5.4.2. induction, coercion, constraint;

4.5.4.3. disrespect for the roles of others;

4.5.4.4. harassment of any kind;

4.5.4.5. Public disqualification, offense or threat.

4.5.5. Respect the diversity of the group of people who form the working environment.

4.6. Banco do Brasil Assets and Resources

4.6.1. Refrain from using the facilities, equipment, work materials and electronic communications network for political or religious issues, or for your own commercial interests or those of third parties.

4.6.2. Comply with the rules governing the intellectual property of books, texts, images and other copyrighted products.

4.6.3. Only install, use or permit the use of computer programs (software) licensed for the Bank.

4.6.4. Preserve the institutional identity, avoiding use of the Bank's name, its brands and its private symbols in advertising or in the name of any entity.

4.6.5. Refrain from disclosing studies, methodologies, techniques or models made for the Bank without prior authorization.

4.6.6. Observe the restricted ability of the spokespeople to meet the demand for information by the media, according to the BB Institutional Speech guidelines.

4.6.6.1. General managers, superintendents, executive officers, directors and members of the Board are spokespeople of the Bank.

4.7. Information Security and Treatment

4.7.1. Protect information to ensure its integrity, confidentiality and availability.

4.7.2. Protect the confidentiality of information concerning the relevant acts or facts to which they have privileged access because of their rank, position or function.

4.7.3. Preserve information security, refraining from discussing confidential matters relating to the Bank on chat rooms, social networks and online applications.

4.7.4. Provide reliable information, when requested, within the deadlines, even when assigned to the external body.

4.7.5. Refrain from consulting the registration, accounts and applications of employees and account holders unless it is necessary to a service, thus preserving registration, banking, corporate and professional confidentiality.

4.7.6. To ensure that the accounting records and the financial demonstrations are to be true, complete, precise, clear and in conformity with the legislation, the principles and norms of accounting, as well as the internal controls.

4.8. External Audience

4.8.1. Refrain from disparaging or issuing value judgments regarding products and services from the competition.

4.8.2. Maintain courteous relationships with the government of Brazil and the countries in which we operate, regardless of the ideological positioning of their holders.

4.8.3. Provide correct, complete and well-timed business information to clients, users, stakeholders, investors and suppliers.

4.8.4. Avoid using inadequate practices when offering products and services, such as any form of imposition for the execution of business.

4.8.5. Conduct bidding processes, contracting and formalization of agreements, conventions and partnerships under your responsibility with honesty, ethics, integrity and impartiality.

4.8.6. Refrain from giving, offering, promising or authorizing anything of value to a Brazilian or foreign government official, either directly or through an intermediary, in order to influence any action to gain an improper advantage.

4.9. Management Segment Responsibility

4.9.1. The management segment is also responsible for:

4.9.1.1. disseminating knowledge, complying with and enforcing laws, regulations, policies, the Code of Ethics and Standards of Conduct of the Bank;

4.9.1.2. refrain from practicing any act which can result in civil or labor action, or which can in any way harm the nature of the Bank, being worthy of, if needed, adequate technical orientation;

4.9.1.3. supervising and adopting measures to inhibit irregularities, enhancing administrative methods of work control and organization;

4.9.1.4. promoting civility and formative action to correct the performance or conduct of any subordinate;

4.9.1.5. maintaining accessible criteria for evaluating performance, merit and competence, using them as a basis in decisions relating to remuneration, recognition and career advancement;

4.9.1.6. Communicate with the Institutional Security Directorship about alterations to the economic-financial situation of the worker and other associates, or if these maintain a business relationship with the person or organization involved in illicit activity;

4.9.1.7. refraining from keeping a spouse, partner or immediate or extended relative, by blood or affinity to the 3rd degree of kinship, under their direct hierarchical subordination;

4.9.1.8. sharing a culture of care and concern for the heritage and image of the Bank;

4.9.1.9. refraining from using exclusive goods or services of the administration for private purposes;

4.9.1.10. controlling access to and use of corporate information by employees;

4.9.1.11. ensuring the authenticity, reliability, clarity and objectivity of reports, account services and working agreements.

4.10. Senior Management Responsibility

4.10.1. Senior management is also responsible for:

4.10.1.1. observing the legal rules that apply to the role of the job, including public law, when the Bank is vested in civil service and when the management of money, public assets and values are under the responsibility of the Bank;

4.10.1.2. complying with the Code of Conduct of the High Federal Administration, which supports the legislation regulating mixed economy corporations.

5. Questions, Reports and Breach of Contract of the Documents

5.1 Questions

5.1.1. In the case of questions in relation to the application of the Code of Ethics and of the Standards of Conduct, talk with a superior or consult the State Ethics Committee, by means of registering on the Internal Portal of the Organizational Ombudsman.

5.1.2. In case of doubt as to the exercise of parallel activity happening to the Bank, Brazilian officials may submit a consultation or request of authorization to the Ministério da Transparência e Controladoria-Geral da União, through the Electronic System for Conflict of Interest Prevention (SeCI).

5.2. Reports and Infringement of Documents

5.2.1. Report any misconduct or irregularities observed to the Organizational Ombudsman, even anonymously.

5.2.1.1. The complaint must indicate the person responsible for the irregularity, a true description of the facts and evidence or witnesses, in order to facilitate the determination of the occurrence.

5.2.2. Organizational Ombudsman Contacts:

5.2.2.1. Email: ouvidoriainterna@bb.com.br.

5.2.2.2. Intranet: Organizational Ombudsman menu.

5.2.2.3. SISBB: CORREIO Application - Prefix 8559 DIPES/GEINP/OUVIR.

5.2.2.4. Telephone: +55(61) 3108-7488

5.2.2.5. Mail: SAUN Quadra 5, Bloco B, Torre Central, 5º andar, Brasília DF, CEP 70040-912.

5.2.2.6. In person: address above.

5.2.3. Report any eventual suspicion of a harmful act, classifiable as corruption, practiced by a legal entity against the Bank, or against the Brazilian or foreign public administration practiced by an employee or third party acting in the interest or benefit of the Bank to the Institutional Security Board using the Criminal Reporting Channel, available on the BB Portal, including anonymously.

5.2.4. The reports are conducted by autonomous and specialized instances, such as, for example, Internal Audit, Institutional Security Directorship, Organizational Ombudsman, and the Regional Manager of Operational Risk.

5.2.5. The bank handles the reports received with confidentiality, and guarantees anonymity, as a way of protecting the author against any kind of retaliation.

5.2.6. That which fails to adhere to the Code of Ethics and of the Standards of Conduct, is subject to the penalties established in the normative instructions of Banco do Brasil, and may be held responsible in the judicial sphere.

Ética e Ouvidoria Interna

President
Marcelo Augusto Dutra Labuto

Vice-President
João Pinto Rabelo Junior

Director
José Caetano de Andrade Minchillo

Executive manager
Adriano Weber Scheeren

Internal Ombudsman
Carlos Altemir Schmitt