

GLOBAL –Sustainability Policy

Category: ESG

Objective:

This Policy sets forth BTG Pactual's sustainability commitments and also defines the principles and directives that guide the Bank's activities and businesses, the relationships with interested parties and business decision-making process, establishing who is responsible for their implementation.

Norms:

- COMP 001 – GLOBAL – Code of Business Principles and Ethics
- COMP 003 – GLOBAL – Corporate Governance: Management Structure and Risk Control
- ESG 002 – GLOBAL – Timberland Responsible Investment Policy
- ESG 003 – GLOBAL – Environmental and Social Risk Policy

To whom does this Policy apply?

All subsidiaries and business units of Banco BTG Pactual, in Brazil and abroad, and companies from the economic conglomerate, in cases where the latter do not have their own business sustainability policies.

Policy breaches may result in disciplinary action, including dismissal.

Contents

| | | |
|---|--|---|
| 1 | Fundamentals..... | 3 |
| 2 | Fundamental Principles of ESG | 3 |
| 3 | Governance and Implementation | 4 |
| 4 | Communication and Transparency..... | 5 |
| 5 | Control of Actions and Exceptions..... | 5 |

1 Fundamentals

Since its inception, in 1983, Banco BTG Pactual has based its actions on the deep-rooted pillars of meritocracy and partnership, where the talent, dedication and performance of our employees are the fundamentals of our continuous growth and long-term vision. This Policy is aligned with Our Values and Our Competences, and aims to strengthen our responsible, sustainable relationship with investors, clients, employees, suppliers, society and, indeed, our entire value chain.

Our vision of sustainability is grounded on the understanding of our responsibility in promoting the best practices and encouraging their implementation throughout our entire value chain – investors, clients, employees, suppliers, society and other interested parties.

BTG Pactual's Sustainability Policy reflects our long-term ambition and unconditional commitment to responsible, sustainable development. We operate with a consistent focus on the long-term implications and results of our actions and relationships, prioritizing long-term benefits over short-term gains whilst constantly monitoring the risks and opportunities that environmental, social and corporate governance ("ESG") aspects may bring. We believe that solid commercial practices and business responsibility are long-term drivers that must be applied daily to generate value for shareholders via sustainable growth.

2 Fundamental Principles of ESG

At BTG Pactual, we:

- 1 Recognize the importance of the **17 Sustainable Development Goal**, imposed by Agenda 2030 of the United Nations and, respecting the externalities of each situation, we work in favor of this development agenda
- 2 Identify the **social and environmental impacts resulting from our own operations**, including those related to climate change, and implement structured ecoefficiency programs to reduce these impacts
- 3 Promote a **diverse, equal, inclusive and transparent work environment**, and communicate all relevant sustainability information clearly and transparently
- 4 **Incorporate ESG criteria** into our decision making, in order to understand the risks and opportunities of each new business
- 5 Organize **sustainability awareness training sessions and campaigns** to guarantee that the principles established in this Policy are adequately implemented by our employees
- 6 Incentivize and seek new **business opportunities that generate long-term shared** financial, environmental and social **value** for our investors, clients and society
- 7 Encourage **open dialog and engage with all interested parties** in relation to matters of sustainability, in order to generate shared value in the sustainability agenda

3 Governance and Implementation

The Sustainability Policy is approved by the Board of Directors, BTG Pactual's highest level of governance.

The principles herein established must be incorporated into BTG Pactual's activities and businesses, and their implementation falls under the responsibility of the ESG Committee. Members of ESG Committee: C-level, senior partners and Head of ESG.

The daily routine of the sustainability programs falls under the responsibility of the ESG area, formed by specialists in the matters covered by this Policy, and the business and back office areas, who must incorporate the principles established by this Policy into their daily activities and operations.

The ESG area is also responsible for proposing and monitoring sustainability indicators, based on the material impacts of BTG Pactual's business, and for recommending adoption of the voluntary public commitments that reinforce BTG Pactual's positioning towards business sustainability.

At BTG Pactual, we commit to:

- 1 Work in strict compliance with the Code of Business Principles and Ethics, which establishes BTG Pactual's core values
- 2 Incorporate Sustainable Development Goals, imposed by the UN's 2030 Agenda, into our strategic planning, especially those identified as material to BTG Pactual's activities, showing related indicators and targets
- 3 Introduce ecoefficiency programs at BTG Pactual's offices, guaranteeing respect of natural capital, the environment, conscious consumption of natural resources and adequate waste disposal
- 4 Respect and promote human rights, aligned with the Principles of the UN's Global Compact
- 5 Calculate carbon emissions, and establish targets related to the inventory of emissions, considering the challenges imposed by climate change
- 6 Develop methods of environmental and social analysis and integration of environmental, social and corporate governance aspects for the management of third-party assets, including climactic variables in these analysis models
- 7 Develop new products that, beyond their financial return, bring environmental and social benefits for society – e.g. those that promote socio-economic inclusion and reduction of social inequalities
- 8 Work alongside the business and back office areas in order to adhere to voluntary market commitments and coordinate responses to sustainability rankings and awards
- 9 Hold awareness programs, sustainability training sessions and maintain internal and external dialog channels with our interested parties, including with the community, preserving a responsible, development relationship
- 10 Hold regular meetings of the ESG Committee, guaranteeing alignment of all activities with senior management
- 11 Review this Policy on a regular basis in accordance with good market practices

4 Communication and Transparency

Feedback and transparency are an essential part of our commitment to sustainability. Aligned with the best market practices, we will provide frequent updates on the progress of our sustainability agenda.

5 Control of Actions and Exceptions

The sustainability agenda is grounded on BTG Pactual's solid compliance structure and internal controls, which will be responsible for ensuring compliance with all activities set forth in this Policy.

Any exception to this Policy must be approved by the ESG Committee, which – if it deems necessary – will forward the decision to the Board of Directors.