

**BRADESCO**  
**Governance Information on the System**  
**V1/2019**

Item	Answer	Justification
<b>Shareholders</b>		
<b>1.1 Equity Stake</b>		
1.1.1 The share capital of the Company shall be composed only by common shares.	<b>No</b>	<p>The Company chose to have a corporate structure with established control and with the differentiation between kinds of shares, in order to facilitate, through greater flexibility in the capital structure, the Company's capitalization.</p> <p>- Current shareholding structure and the political and economic rights of each kind or class of shares.</p> <p>The Company has the following shareholding structure, on April, 2019, the stakes were calculated based on the total capital, including shares held in treasury:</p> <p>Controlling Shareholders: Common – 71.0257%, Preferred – 2.2560%, Total: 36.6409%</p> <p>Other Shareholders: Common – 28.9743%, Preferred – 97.7440%, Total: 63.3591%.</p> <p>The Bylaws of the Company ensures to all shareholders, in each financial year, as the minimum mandatory dividend, 30% of the net profit, adjusted by the decrease or increase of the values specified in sections I, II and III of the "caput" of Article 202 of Law 6.404/76.</p> <p>The Company's shares may be divided into kinds, namely:</p> <p>The Common Shares (ON): have the right to vote in all resolutions of the shareholders' meetings. In addition, the Bylaws of the Company grant to its shareholders, not members of the controlling block, the receipt of 100% of the value paid per common share of ownership of the controlling shareholders, in the case of inclusion of the public offer due to the eventual change of control of the Company (tag along), going beyond the legal requirement, which is 80%.</p> <p>The Preferred Shares (PN): do not have the right to vote, with the exception of cases provided for by law, which are: (i) election of members to the Board of Directors, whose shareholders represent at least 10% of the share capital, have the prerogative to elect their candidates in a separate voting, as well as being entitled to elect, also in a separate voting, 1 member for the Fiscal Council and their respective alternate, in accordance with Articles 141 and 161 of Law 6.404/76; and (ii) in the case of special meeting of preferred</p>

shareholders, pursuant to the First Paragraph of Article 136 of Law 6.404/76. Also in line with the Bylaws, the shareholders shall be ensured the receipt of the price equal to 80% of the value paid per share for the common share as part of the controlling block (tag along), a benefit that has no legal provision. Also, priority is given to the refund of the share capital and dividends 10% higher than those attributed to common shares. Finally, we highlight that the Company respects the legal provision that the number of preferred shares cannot exceed 50% of the total shares issued.

#### Form of exercising the control

The control is exercised together, directly, by Cidade de Deus – Cia. Comercial de Participações S.A. (Cidade de Deus) (approximately 45% of the voting capital). Fundação Bradesco (Foundation) (approximately 17% of the voting capital) and NCF Participações S.A. (approximately 8% of the voting capital) and, indirectly, by Nova Cidade de Deus Participações S.A., BBD Participações S.A. (BBD), in addition to Foundation itself. It is important to stress that the largest individual shareholder has only 1.47% of the voting capital of Banco Bradesco, on the base date of April, 2019.

Although there is no Shareholders' Agreement or shareholder with a shareholding that exceeds 50%, it is necessary to observe the presence of several companies of the same economic group as shareholders of the Company and several companies of that same group as shareholders of the Company's shareholders. Therefore, it is possible to identify the way in which the control is exercised in practice. To facilitate this analysis, we observed below the shareholding composition of each one of the controllers of the Company, on the base date of April, 2019.

#### Cidade de Deus – Cia. Comercial de Participações S.A.

Shareholders	% Voting Capital
Nova Cidade de Deus	47.89
Fundação Bradesco	35.41
Família Aguiar	16.70
Total	100

#### NCF Participações S.A.

Shareholders	% Voting Capital
Cidade de Deus	74.72
Fundação Bradesco	25.13
Nova Cidade de Deus	0.15
Total	100

Nova Cidade de Deus Participações S.A.

Shareholders	% Voting Capital
BBD	53.70
Fundação Bradesco	46.30
Total	100

#### Fundação Bradesco

Fundação Bradesco has no shareholders. It is an entity declared as a Public Utility for Federal, State and Municipal Governments, established by allocation of Banco Bradesco, as a nonprofit private entity.

It has a Managing Board, supreme deliberative body composed of Management members of Banco Bradesco and of Cidade de Deus

#### BBD

People who can be shareholders of BBD are defined in its Bylaws. Currently, it has more than 400 shareholders, especially Managers of Banco Bradesco and its subsidiaries, in which the main shareholder holds approximately 6% of the voting capital.

Once they leave the Bradesco Organization, by statutory provision, they are obliged to sell their stakes.

The structure above can be visualized in item 15.4 of the Reference Form.

#### **Mechanisms that mitigate the asymmetry of political and economic rights**

The Company understands that the asymmetry of political rights (for example, the right to a guaranteed vote in all situations to the holders of common shares) and economic rights (since the holders of common shares will receive 100% of the value paid per share of ownership of the controllers, in the case of inclusion of public offer due to the eventual disposal of the control of Company, while the holders of preferred shares will receive 80%, among others) is mitigated with both the payment to holders of preferred shares, of dividends 10% higher than those paid to holders of common shares, as well as the priority in the reimbursement of the share capital in case of liquidation of the Company.

In addition, the holders of preferred shares have the right to vote in special situations, provided for in law, as previously mentioned.

### 1.2 Shareholders' Agreement

1.2.1 The shareholders' agreements shall not bind the exercise of the right to vote of any manager or member of the supervisory and control bodies.

**Not applicable**

Not applicable

### 1.3 Shareholders' Meeting

1.3.1 The Board of Executive Officers must use the meeting to communicate the running of the business of the Company, for which the Management should publish a manual to facilitate and encourage the participation in shareholders' meetings.

**Yes**

Not applicable

1.3.2 The minutes should allow the full understanding of the discussions during the meeting, even if they appear in the form of a summary of facts occurred, and bring the identification of the votes cast by the shareholders.

**Yes**

Not applicable

### 1.4 Measures of Defense

1.4.1 The Board of Directors shall make a critical analysis of the advantages and disadvantages of the measure of defense and of its characteristics and, above all, the triggers set off and price parameters, if applicable, explaining them.

**Not applicable**

Not applicable

1.4.2 Clauses that impede the removal of the measure of the bylaws, the so-called 'eternity clauses' should not be used.

**Not applicable**

Not applicable

1.4.3 If the Bylaws determines that a takeover bid (TOB) should be made whenever a shareholder or group of shareholders reaches, directly or indirectly, a relevant stake in the voting capital, the rule for determining the price of the offer should not impose a surplus substantially above the economic value or of the stock market.

**Not applicable**

Not applicable

### 1.5 Change of Control

1.5.1 The Bylaws of the Company must establish that: (i) transactions that configure the disposal, directly or indirectly, of the equity control should be

**Yes**

Not applicable

<p>accompanied by a takeover bid (TOB) addressed to all shareholders, at the same price and same conditions obtained by the selling shareholder; (ii) the managers must express an opinion on the terms and conditions of corporate restructuring, capital increases and other transactions that give rise to a change of control, and establish whether they ensure fair and equitable treatment to the shareholders of the Company.</p>		
<b>1.6 Manifestation of the Management on TOBs</b>		
<p>1.6.1 The Bylaws should provide that the members of the Board of Directors give their opinion regarding any TOB having as object shares or securities that can be converted or exchanged for shares of the Company, which shall contain, among other relevant information, the opinion of the Management about the possible acceptance of the TOB and of the economic value of the Company.</p>	<b>Yes</b>	Not applicable
<b>1.7 Policy for Allocation of Earnings</b>		
<p>1.7.1 The Company shall prepare and disseminate the results destination policy defined by the Board of Directors. Among other aspects, such a policy should provide for the periodicity of payments of dividends and the reference parameter to be used for the definition of the respective amount (percentage of adjusted net profit and free cash flow, among others).</p>	<b>Yes</b>	Not applicable
<b>1.8 Joint Capital Companies</b>		
<p>1.8.1 The Bylaws must identify clearly and precisely the public interest that justified the creation of the joint capital company, in a specific chapter.</p>	<b>Not applicable</b>	Not applicable
<p>1.8.2 The Board of Directors shall monitor the Company's activities and establish policies, mechanisms and internal controls for calculation of possible costs of complying with the public interest and possible compensation of the Company or of the other shareholders and investors by the controlling shareholder.</p>	<b>Not applicable</b>	Not applicable
<b>2. Board of Directors</b>		
<b>2.1 Duties</b>		
<p>2.1.1 The Board of Directors shall, without prejudice to other legal and statutory responsibilities, and other practices provided for in the Code: (i) define the business</p>	<b>Yes</b>	The Company adopts all of the practices described in items (i) (ii), (iii) and (iv).

strategies, considering the impacts of the company's activities in society and in the environment, aiming at the company's continuity and creation of value in the long term; (ii) periodically evaluate the company's exposure to risks and the effectiveness of the systems of risk management, internal controls and the integrity/compliance system and approve a risk management policy compatible with the business strategies; (iii) define the values and ethical principles of the company and ensure the maintenance of transparency of the issuer regarding all the stakeholders; (iv) review the system of corporate governance annually, aiming to enhance it.

**Item (i):** According to the Bylaws and to item 12.1(a) of the Reference Form, it is incumbent upon the Board of Directors (i) to ensure that the corporate affairs are conducted with probity, in order to preserve the good name of the Company; and (ii) to establish the general guidance for the Company's business. It can be said, therefore, that the Body is responsible for promoting the generation of value, considering the impacts of the Organization's activities on society and on the environment, strengthening the continuity of the business and the generation of value in the long term.

In a complementary manner, it is worth highlighting item "i" of Article 2 of the Charter of the Board of Directors, which gives the Board the power to "establish the guidance strategy for the Company, with the aim, within the best practices of corporate governance, of protecting and maximizing the return on investment of the shareholder", as well as item "xiii" of Article 2 of the Charter, which provides for the competence of the Board "whenever possible, to preserve the administrative continuity, envisaging the stability, prosperity and security of the Company".

Therefore, it is understood that the Board of Directors operates in such a way as to ensure the practices described in this item.

**Item (ii):** We also have a risk management structure that supports the Board in making strategic decisions.

The structure is composed by the Risk Committee, aimed at assisting the Board of Directors in performing its duties related to risk and capital management. Said Committee reports its activities and decisions to the Board of Directors on a quarterly basis and its duties are defined in the charter, which is made available on the website of the Investor Relations and in item 12.1 of the Reference Form.

Besides the Risk Committee, the Organization has the Integrated Risk Management and Capital Allocation Committee (COGIRAC), which comprises the Advisors and Executives from key areas of the Organization. Its charter is made available on the website of the Investor Relations and in item 12.1 of the Reference Form of the Company. Its duties include the validation and submission of the policies related to the capital risk management for the Board's approval. COGIRAC also counts on the support of the Executive Risk Committees that ensure the effectiveness of the risk management process.

In addition to those Committees, the Company has risk management policies aligned with its strategic objectives and with the best national and international practices, reviewed annually by the Board.

Regarding compliance, there is the CCIC, the committee subordinate to the Board, whose goal is to assist them in the adoption of strategies, policies and measures aimed at spreading the culture of internal controls, risk mitigation and compliance with applicable

standards. In addition, the guidelines concerning the topic were defined by the Board in 2006 in the Internal Control and Compliance Policy.

The governance of risks is constantly evaluated by the Risk Committee, Internal Controls and Compliance Committee (CCIC), and by the Internal Audit. It is also analyzed by external audit, and rating and regulating agencies.

The Board also approved the Compliance Program, in line with BACEN Resolution No. 4.595/17, giving the tone of the strategy of risk management and becoming aware of the Compliance reports, especially on the aspects of non-compliance.

**Item (iii):** On the subject of Ethics, the body subordinated to the Board responsible for proposing actions for the dissemination and enforcement of Codes of the Organization is the Ethical Conduct and Integrity Committee. Established in 2003, its charter is available on the Investor Relations website.

Also in 2003, the Corporate Code of Ethical Conduct was formalized, which guides the personal and professional conduct for managers, employees, suppliers, business partners and service providers.

In addition, we have four other Sector Codes of Ethical Conduct:

- Professional in Purchases;
- Professional of the Financial and Capital Market;
- Bradesco Organization Auditors and Inspectors and
- Grupo Bradesco de Seguros e Previdência (Insurance and Pension).

To extend the coverage of the Code to all employees of the Organization, we use the following means:

Each employee admitted undertakes to comply with the Code, by signing the protocol of adherence and commitment.

Addressing the theme of Ethics in the cycles of lectures, in the training courses for managers and in courses on-site.

Endomarketing campaigns on Ethics.

Institutional videos on matters contained in the Code.

Video training about day-to-day ethical dilemmas.

Corporate Self-evaluation, to assess the level of knowledge, understanding and compliance, by its employees, of issues such as ethical values and policies and standards relating to risk management and internal controls.

		<p>To cover the Code to third parties, the contracts are signed with a specific clause on the themes of Ethics and Anti-corruption.</p> <p>Regarding the clarification of doubts, the immediate superior should be consulted or other internal channels available. The right of anonymous reporting is guaranteed. Contact information is in the document "Channels for receipt of complaints concerning violations of the Codes of Ethical Conduct, of the policies and standards of the Bradesco Organization", available on the Corporate Portal and on the Investor Relations website.</p> <p><b>Item (iv):</b> Another role of the Board is to review the Bank's system of governance annually, according to its Charter, whose process ordinarily occurs before the summons for the Annual Shareholders' Meeting or in a timely manner, by means of approval by the Board, of the constitution, review or evaluation of the committees subordinate to them, to make administrative changes, establish subsidiaries, corporate restructuring and institution of codes, policies and internal regulations.</p>
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**2.2 Membership of the Board of Directors**

<p>2.2.1 The Bylaws must establish that: (i) the Board of Directors is composed in its majority by external members, having at least one-third of independent members; (ii) the Board of Directors shall assess and disclose the independent directors annually, as well as indicating and justifying any circumstances that might compromise their independence.</p>	<b>No</b>	<p>The Company does not establish the statutory provision that the Board of Directors of Bradesco should be composed by a majority of external members, or that at least 1/3 of its composition is formed by independent members. In any case, the current composition of the Board of Directors of the Company is according to its structure, as well as with the Brazilian Corporations Law and with the Listing Regulation of Level 1 of Corporate Governance of B3.</p> <p>Although there is no statutory provision with a minimum number of independent directors, the exercise of a multiple or separate vote is guaranteed to minority shareholders, with the aim of ensuring their representation on the Board of Directors. Therefore, considering that minority shareholders exercise their right to vote separately, it can be concluded that they guarantee their representativeness, electing one member of the Board of Directors.</p> <p>Currently, the Body is composed of the eight members listed below:</p> <p>Luiz Carlos Trabuco Cappi – External Member</p> <p>Carlos Alberto Rodrigues Guilherme – External Member</p> <p>Denise Aguiar Alvarez – External Member</p> <p>João Aguiar Alvarez – External Member</p> <p>Milton Matsumoto – External Member</p> <p>Alexandre da Silva Glüher – External Member</p>
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		<p>Josué Augusto Pancini – External Member</p> <p>Maurício Machado de Minas – External Member</p> <p>The process of candidate nomination for the Board of Directors is conducted by the Committee of Succession and Nomination of the Bradesco Organization, based on the guidelines set out in the Policy of Succession and Nomination of Managers of the Bradesco Organization, available on the Investor Relations website.</p> <p>Bradesco develops and prepares its employees to take on senior positions, when available. Thus, the job positions of the Management are occupied by professionals trained within the Organization itself, and therefore reveals a personal career that is consolidated and focused on the Organization’s medium and long-term objectives.</p> <p>The presence of both former executives and current executives on the Board strengthens the organizational culture through which these professionals are prioritized, with several years of experience and capacity to manage, with greater knowledge, the guidelines for a strategic planning aligned to the Mission of the Organization.</p> <p>The organizational culture is reflected, therefore, in the composition and functioning of the Board of Directors. In this sense, the election for the Board constitutes a "promotion" for the executive who has dedicated his/her professional life to the Company, resulting in his/her ascension to the last stage of the banking hierarchy, therefore, representing an evolution in the career plan of the company.</p> <p>By virtue of this practice, our Board of Directors is characterized by being at the Company every day, and located physically in the same room as the Executive Officers, which provides agility and speed in decision-making.</p> <p>In spite of our Board of Directors not being considered independent according to the criteria established by B3 - Brasil, Bolsa, Balcão and by the Code of Best Corporate Governance Practices of the Brazilian Institute of Corporate Governance (IBGC), we believe that of the 8 current members have independent action, due to being external directors.</p>
<p>2.2.2 The Board of Directors shall adopt a policy on nomination that establishes: (i) the process for the nomination of the members for the Board of Directors, also indicating participation of other bodies of the company in that process; (ii) that the Board of Directors shall be composed in view of the availability of time of its members for the exercise of their responsibilities and the diversity of knowledge, experiences, attitudes, cultural aspects, age group and gender.</p>	<p><b>Yes</b></p>	<p>The process of nomination of managers in the Bradesco Organization, which includes both members of the Board of Directors and the Board of Executive Officers, is embodied in the guidelines established by the "Policy of Succession and Nomination of Managers of the Bradesco Organization" publicly available on the company's Investor Relations website.</p> <p>The referred Policy establishes that both the availability of time and aspects of diversity, such as gender, race, ethnicity and age group, as well as diversity of experience and knowledge, are respected in the process of nomination of possible candidates for vacancies on the Board of Directors. This process occurs by meritocracy. Thus, any Executive Officer, regardless of gender, has the possibility of being elected to compose the Board of Directors.</p>

		As adviser to the Board in conducting this process, there is the Committee of Succession and Nomination of the Bradesco Organization, the body subordinate to the Board of Directors, which acts on behalf of all the Institutions members of the Organization.
<b>2.3 Chairman of the Board</b>		
2.3.1 The Chief Executive Officer should not accumulate the position of Chairman of the Board of Directors.	<b>Yes</b>	Not applicable

<b>2.4 Evaluation of the Board and Members</b>		
2.4.1 The company should implement an annual performance appraisal process of the Board of Directors and of its committees, as collective bodies, of the Chairman of the Board of Directors, of the Board Members, considered individually, and of the governance department, if it is in place.	<b>Yes</b>	<p><b>Board of Directors</b></p> <p>As described in item 12.1(d) of the Reference Form, annually, both of the Chairman and other Members of the Board of Directors of the Company, considered individually, and the Body, as a collective body, are evaluated by the controlling shareholders, based on the indicators established by them, which consider:</p> <p>For the Board Members, individually:</p> <ul style="list-style-type: none"> <li>Respect to the Bylaws;</li> <li>Loyalty;</li> <li>Confidentiality of Information;</li> <li>Integrity;</li> <li>Values and Objectives of the Company;</li> <li>Duties;</li> <li>Instruction;</li> <li>Expertise;</li> <li>Time Availability;</li> <li>Motivation;</li> <li>Responsibility;</li> <li>Team work;</li> <li>Corporate Governance;</li> <li>Risk Management;</li> <li>Conflict of Interest; and</li> <li>Relationship with other Bodies of Management, Supervision and Advisory.</li> </ul>

		<p>And for the Body, as a collegiate body:</p> <ul style="list-style-type: none"> <li>Diversity;</li> <li>Term of Office and maximum number of other boards;</li> <li>Segregation of Duties;</li> <li>Succession;</li> <li>Duties;</li> <li>Advisory Bodies;</li> <li>Annual Calendar of Meetings;</li> <li>Relations;</li> <li>Sustainability; and</li> <li>Risk Management and Compliance.</li> </ul> <p>Based on the results of the evaluations, the controlling shareholders analyze the results of the evaluations, identifying the points for improvement of the body, as well as the actions to be implemented in order to submit the names of possible candidates for the re-election process.</p> <p><b><u>Committees and Governance Department</u></b></p> <p>Also, on an annual basis, there is the assessment, by the Board of Directors, of committees subordinate to it and of the Governance Department, as provided for in the Charter of the Body, available on the Investor Relations website.</p>
<b>2.5 Planning of Succession</b>		
<p>2.5.1 The Board of Directors shall approve and maintain updated a succession plan of the CEO, which preparation should be coordinated by the Chairman of the Board of Directors.</p>	<b>Yes</b>	<p>The succession plan for Managers, which encompasses both the CEO and the other Executive Officers, and also members to be nominated to compose the Board of Directors, is embodied in the application of the Guidelines of the Policy of Succession and Nomination, which applicability is accompanied by the Committee of Succession and Nomination, with the final approval of the entire process by the Board of Directors.</p> <p>Every year, in the first quarter, the Board meets to approve and review the succession plan for the CEO, which entered into force on November 17, 2006, date on which it was formalized in the Minutes of the Special Meeting of the Board of Directors no. 1.182. In 2019, the plan was renewed in the Board Meeting dated February 5, 2019.</p>
<b>2.6 Integration of New Directors</b>		

<p>2.6.1 The Company must have a program for the integration of new members of the Board of Directors, previously structured, so that those members are introduced to the key people of the company and to its premises and which addresses topics essential to the understanding of the company's business.</p>	<p><b>No</b></p>	<p>Currently, the Company does not have a program for the integration of new members of the Board of Directors.</p> <p>There is no formalization of a program of integration of new directors, because, due to the organizational culture, the Board of Directors is composed by former executives of the Bradesco Organization. Therefore, the executive positions are occupied mostly by professionals trained within the Organization itself. This system aims to benefit our best professionals and promotes a constant rotational movement, relocating employees, especially those in leadership positions in different areas. With the rotation of roles, we provide our managers with more integration, experience, personal challenges and consolidation of the career, being permanently monitored and evaluated for possible movements in the hierarchy.</p> <p>Therefore, this undergone by our Executives prepares them and integrates them to take up office on the Board of Directors.</p>
<p><b>2.7 Compensation of the Members of the Board of Directors</b></p>		
<p>2.7.1 The compensation of the members of the Board of Directors shall be commensurate with their duties, responsibilities and time demands. There shall be no compensation based on participation in meetings, and the variable compensation of directors, if any, must not be tied to the short-term results.</p>	<p><b>Yes</b></p>	<p>Not applicable</p>
<p><b>2.8 Charter of the Board of Directors</b></p>		
<p>2.8.1 The Board of Directors shall have internal regulations which establish their responsibilities, duties and operating rules, including: (i) the duties of the Chairman of the Board of Directors; (ii) the rules for replacing the Chairman of the Board in his/her absence or vacancy; (iii) the measures to be adopted in situations of conflict of interest; and (iv) the definition of the appropriate deadline for the receipt of the materials for discussion in the meetings, with the proper depth.</p>	<p><b>Yes</b></p>	<p>Not applicable</p>
<p><b>2.9 Meetings of the Board of Directors</b></p>		

<p>2.9.1 The Board of Directors shall establish an annual calendar with the dates of the annual meetings, which should be no less than six and no more than twelve, in addition to convening special meetings, whenever necessary. This calendar shall provide for an annual thematic agenda with relevant topics and dates of discussion.</p>	<p><b>Yes</b></p>	<p>Not applicable</p>
<p>2.9.2 The Board meetings shall provide regular sessions exclusive to external directors, without the presence of the executives and other guests, for the alignment of the external directors and discussion of themes that may create embarrassment.</p>	<p><b>Yes</b></p>	<p>Not applicable</p>
<p>2.9.3 The minutes of the Board meetings should be drafted with clarity, recording the decisions taken, the attending persons, the dissenting votes and the abstentions in the votes cast.</p>	<p><b>Yes</b></p>	<p>In accordance with the Third Paragraph of Article 8 of the Charter of the Board of Directors, for each meeting of the Body the minutes should be drawn up, which content is clear and objective. The attending directors, those absent and all the guests of the meeting are duly informed thereof, in addition to the direction of the votes of the members of the Body.</p> <p>The minutes of the meetings with effects towards third parties are made available on the Investor Relations website.</p>
<p><b>3. Board of Executive Officers</b></p>		
<p><b>3.1 Duties</b></p>		
<p>3.1.1 The Board of Executive Officers shall, without prejudice to other legal and statutory responsibilities and other practices provided for in the Code: (i) perform the risk management policy and, where necessary, propose to the Board any needs for review of this policy, due to changes in the risks to which the company is exposed; (ii) implement and maintain mechanisms, processes and effective programs for the monitoring and disclosure of the financial and operational performance and the impacts of the company's activities on society and on the environment.</p>	<p><b>Yes</b></p>	<p>Not applicable</p>
<p>3.1.2 The Board of Executive Officers must have internal regulations that establish its structure, its operation and its roles and responsibilities.</p>	<p><b>Yes</b></p>	<p>Not applicable</p>
<p><b>3.2 Appointment of the Officers</b></p>		

<p>3.2.1 There should be no reservation of positions on the Board of Executive Officers or managerial positions for direct nomination by shareholders.</p>	<p><b>Yes</b></p>	<p>Not applicable</p>
<p><b>3.3 Evaluation of the CEO and of the Board of Executive Officers</b></p>		
<p>3.3.1 The CEO should be evaluated, annually, by formal process conducted by the Board of Directors, based on the verification of the achievement of the goals of financial and non-financial performance established by the Board of Directors for the company.</p>	<p><b>Yes</b></p>	<p>Both the CEO and other members of the Board of Executive Officers are evaluated, for the purpose of election, in the first quarter of the fiscal year. In 2019, the outcome of this evaluation was delivered to the Board of Directors on February 5, 2019.</p> <p>In addition, quarterly or every six months, both the CEO and the remaining Officers are evaluated, as formalized in the Corporate Standard for the Compensation of Managers of the Bradesco Organization, for the possible receipt of variable compensation.</p> <p>In the financial year of 2018 until June/2019, these evaluations occurred every quarter, which results were brought to the knowledge of the Board of Directors on the following dates: February 2, 2018, May 3, 2018, July 31, 2018, November 6, 2018, February 5, 2019 and April 29, 2019.</p>
<p>3.3.2 The results of the evaluation of the other officers, including the propositions of the CEO regarding the targets to be agreed on and to the permanence, promotion or dismissal of executives in their respective positions, must be presented, analyzed, discussed and approved in the meeting of the Board of Directors.</p>	<p><b>Yes</b></p>	<p>Both the CEO and other members of the Board of Executive Officers are evaluated, for the purpose of election, in the first quarter of the fiscal year. In 2019, the outcome of this evaluation was delivered to the Board of Directors on February 5, 2019.</p> <p>In addition, quarterly or every six months, both the CEO and the remaining Officers are evaluated, as formalized in the Corporate Standard for the Compensation of Managers of the Bradesco Organization, for the possible receipt of variable compensation.</p> <p>In the financial year of 2018 until June/2019, these evaluations occurred every quarter, which results were brought to the knowledge of the Board of Directors on the following dates: February 2, 2018, May 3, 2018, July 31, 2018, November 6, 2018, February 5, 2019 and April 29, 2019.</p>
<p><b>3.4 Compensation of the Board of Executive Officers</b></p>		
<p>3.4.1 The compensation of the Board of Executive Officers must be established by means of a compensation policy approved by the Board of Directors by means of a formal and transparent procedure that considers the costs and risks involved.</p>	<p><b>Yes</b></p>	<p>The Central Bank of Brazil made public, on November 25, 2010, Resolution No. 3.921, of the National Monetary Council, which provides for the compensation policy for managers of financial institutions and other institutions authorized to operate by the Central Bank of Brazil.</p>

Therefore, on February 6, 2012, the Board of Directors approved the Policy for Compensation of the Managers of the Bradesco Organization, which, in accordance with the aforementioned Resolution, is compatible with the risk management policy of the Bank and has been formulated so as not to encourage behaviors that increase the exposure to risks above the levels considered prudent in strategies in the short, medium and long terms adopted by the institution.

This policy is publicly available on the company's Investor Relations website and has as basic guidelines:

- to ensure that the compensation practice is in accordance with the laws, rules and regulations that govern the matter, based on the responsibilities of the Managers, arising out of the positions that they occupy and the role they play; on the time dedicated to their roles; on the competence and professional reputation, in view of their experience and qualification; and on the value of their services on the market;
- to provide the alignment between the practices of the Managers' compensation and the interests of the Organization, so that the decisions taken are the best possible, seeking to create value for its shareholders and investors; and
- to ensure, as already mentioned above, that the compensation practice is related to goals that seek the appreciation of the Organization, not encouraging behaviors that increase the exposure to risk above the levels considered as prudent in the short, medium and long term strategies adopted.

In addition to the rules issued by the National Monetary Council, in the Bradesco Organization, for establishing the Compensation of the Managers, the organizational culture is taken into account, having as main practices the "Rotation of Roles" in management positions, the adoption of the "Internal Career" system, for the ascension in the functional roles and of Management, and in decision-making, primarily by collective groups.

The Bradesco Organization adopts the "Internal Career" system, hiring people, preferably, for initial positions, developing and preparing these employees to assume senior positions, when available. Thus, the executive positions are occupied with professionals trained within the Organization itself and, therefore, reveal a personal career consolidated and focused on the medium and long-term objectives of the Organization.

Parallel to this "Internal Career" system, and as a form of benefitting our best professionals, Bradesco Organization promotes a constant rotational movement, relocating employees, especially in positions of leadership of the different areas. Bradesco Organization offers the Manager, with the "Rotation of Roles", greater integration,

		<p>experience, personal challenges and consolidation of the career, being permanently monitored and evaluated for possible movements in the hierarchy.</p> <p>The "Internal Career" and "Rotation of Roles", even in positions of leadership, are key points of the pillar of support of the culture of the Bradesco Organization. This philosophy, directed to meet all of the clients' needs, has been the means of distinction of the Organization in its markets of operation, mobilizing, in general, all areas of the Organization.</p> <p>The individual risk taking or by areas, which is inherent to the banking business, is assessed and has its aspects of control in numerous organizational mechanisms, such as: (i) the operation of various committees, enabling the main decisions to be taken collectively by the Board of Executive Officers; (ii) the separation of strategic and operational functions; (iii) the presence and permanent functioning of the Board of Directors; (iv) the "Rotation of Roles"; and (v) the knowledge that the company is acquiring skills and reactions of each one of the Managers, by reason of the long maturing process, provided by the "Internal Career" system. Therefore, there is a natural dilution, among all Managers, of the responsibility for the risks assumed by them.</p> <p>Further information on the compensation policy and practice is available in item 13.1 of the Reference Form of the Company, available on the Investor Relations website and on the CVM website..</p>
<p>3.4.2 Compensation of the Board of Executive Officers must be tied to results, with goals of medium and long term related clearly and objectively to the generation of economic value for the company in the long term.</p>	<p><b>Yes</b></p>	<p>Upon the achievement of the goals of the Organization and of the business risks measured, considering the possible discretionary elements, and the results of the individual performance appraisals, the Managers who meet the expectations will be eligible to receive Variable Compensation, according to the provisions of the Corporate Standard on the Compensation of Managers of Bradesco Organization.</p> <p>Therefore, the Remuneration Committee will submit a proposal to the Board of Directors for payment or not of Variable Compensation to the Managers, based on the results obtained for the goals established in the processes of individual and corporate appraisal, which are linked to the generation of economic value for the Company in the long term, according to the following:</p> <ul style="list-style-type: none"> <li>• key performance indicators that are taken into account in the determination of each element of the compensation</li> </ul> <p>Corporate appraisal process</p> <p>The uniformity in the treatment of the work areas is one of the keys to the effectiveness of the Organization as a way of inhibiting propensities to individualism, maintaining an</p>

environment more conducive to teamwork.

The Organization maintains a culture of collective management, in which all the relevant decisions, business or administrative, are taken by means of committees composed mainly by Managers.

Therefore, even with the establishment of goals and objectives for all areas, individually, for the purpose of compensation the overall performance of the Organization prevails, without any distinction of area, whether it is considered for support or for business, technical or of relationship.

This overall performance, known in the Corporate Standard as the Corporate Appraisal Process, takes into consideration the result of performance indicators, as defined below:

- ROAE – (Return On Adjusted Equity);
- Overall Customer Satisfaction Index;
- Basel Index – Level I;
- IOE – Index of Operational Efficiency;
- Social and Environmental Dimension of the Market Indexes; and
- Index of Coverage.

#### Individual appraisal process

The individual performance of Managers, as well as of their corresponding areas, is monitored by their respective superiors, according to the formal appraisal process, observing the requirements of Bacen Resolution No. 3.921/10.

For the formal appraisal process, specific indicators are defined for the assessment of the areas and for individual assessment, according to the roles of the Manager, considering the areas focused on business, areas of controls and other areas of support.

For the assessment of areas, at least, the following groups of indicators are considered:

- a) actions of the main activity: they are indicators that relate to the goals and objectives of the main activities of the area;
- b) actions geared to operational efficiency: they are indicators that measure operational efficiency, so as to maximize their results with minimum use of resources;
- c) actions geared to risk management: they are corporate indicators that measure exposure to risks and internal controls, duly monitored by the responsible Area (Department of Integrated Risk Control – DIRC);
- d) actions geared to customer service: they are indicators that evaluate the results/levels of satisfaction of internal and/or external customers; and
- e) actions related to socio-environmental aspects: they are indicators that evaluate the level of adherence of the goals defined for the area to socio-environmental aspects.

For the individual appraisal, at least, the following indicators are considered:

- a) quality of the products/services: aims to assess the quality standards of

		<p>products/services offered/provided in accordance with the area of the Manager evaluated;</p> <p>b) commitment to the strategy: aims to assess whether his/her actions reflected positively with relevant contributions to the Strategic Planning in the period;</p> <p>c) participation in collective decisions: aims to evaluate the active participation in meetings and committees summoned, with positions that have contributed to the decisions submitted;</p> <p>d) team leadership: evaluates the process of team management;</p> <p>e) planning: assesses the ability to plan the operations of their area in the medium and long term;</p> <p>f) global vision: evaluates, mainly, the vision of Managers on future trends to meet the demands of the market; and</p> <p>g) applies the indicators listed above to the Board of Directors and its respective members, as appropriate.</p> <p>The performance appraisals of the Managers in the areas of internal control and of risk management should be based on the achievement of the objectives of their own duties and not specifically in the overall performance of the Organization.</p> <p>For more information about how the compensation of the Managers of the Company is composed, see item 13.1 of the Reference Form of the Company.</p>
<p>3.4.3 The structure of incentives must be aligned to the risk limits defined by the Board of Directors and prohibit the same person from controlling the decision-making process and its respective supervision. Nobody should decide on their own compensation.</p>	<p><b>Yes</b></p>	<p>The aggregate amount of the compensation:</p> <ul style="list-style-type: none"> <li>• is proposed to the Board of Directors by the Remuneration Committee, which, according to the best corporate governance practices, is composed, in its majority, by Directors.</li> <li>• the Board, in turn, decides on the submission, to the Shareholders' Meeting, of the proposal for the approval of the amount.</li> </ul> <p>Once the overall amount is approved, the Board of Directors approves the fixed compensation of the Managers, and the Remuneration Committee proposes the variable compensation, based on: (i) the individual appraisal of the Managers, essential prerogative for their permanence in the Company; and (ii) on the overall performance of the Organization.</p> <p>In this way, the Committee proposes to the Board of Directors both the distribution of the variable compensation and how it will be made, i.e., equal multiple to all Managers, which will take as reference the value of the fixed fee for each Manager, so that, for example, if the decision is to pay half a fixed fee, each officer will receive another half fee, if the multiple is six, each Manager will receive a further six times the value corresponding to their monthly fee. There is, therefore, an equitable distribution.</p> <p>Thus, even if the Remuneration Committee is composed in its majority, by Members of the Board of Directors, the existing corporate process, as mentioned above, prevents officers</p>

		<p>from deciding on their own compensation. This process is also supported by the guidelines established in the Compensation Policy for Managers of Bradesco Organization.</p> <p>In addition, this policy ensures that the practice of compensation is linked with objectives that seek the appreciation of the Organization, not encouraging behaviors that increase the exposure to risk above the levels considered prudent in the strategies in the short, medium and long terms adopted, in addition to the absence of conflict of interest in the establishment of compensation, in such a way that the decisions taken are the best possible, seeking to create value for its shareholders and investors.</p> <p>The very practice of variable compensation attributed to Managers is a way of associating the decision-making to the long-term performance, since 50% of the net value of the variable compensation is paid for the acquisition, by the Manager, of PNB shares issued by BBD Participações S.A. and/or PN shares of Banco Bradesco, which are encumbered and unavailable, and become available in 3 equal, annual and successive installments. That is, the better the long-term performance of the Bank, the greater will be amount received by the Manager, as a result of the increase in the market value and, consequently, of the shares.</p>
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**4. Audit and Control Bodies**

**4.1 Audit Committee**

<p>4.1.1 The statutory audit committee shall: (i) have among its responsibilities to advise the Board of Directors on the monitoring and control of the quality of financial statements, on internal controls, on risk management and compliance; (ii) be formed in its majority by independent members and coordinated by an independent member; (iii) have at least one of its independent members with proven experience in the area of corporate accounting, internal controls, financial and audit, cumulatively; and (iv) have its own budget for the hiring of consultants for accounting issues, legal issues or other topics, when the opinion of an external expert is necessary.</p>	<p align="center"><b>Partially</b></p>	<p>Bradesco Organization has had a Statutory Audit Committee since 2004, which objective is to advise the Board of Directors on its tasks related to the monitoring of accounting practices adopted in the preparation of the financial statements of the Company and its subsidiaries and on the indication of the independent audit. With the enactment of Resolution no. 4.588/2017, of the National Monetary Council (CMN), the Audit Committee approves the instruments managed by the internal audit, such as the Charter, Work Plan and Annual Report, for later submission to the Board of Directors.</p> <p>Below are the tasks of the Committee, which are included both in its Charter, available on the Investor Relations website, as well as in the half-yearly Report of the Committee:</p> <ul style="list-style-type: none"> <li>a) to review, prior to the publication to the market, the Financial Statements, including Explanatory Notes, reports of the Management and Independent Auditor's opinion;</li> <li>b) to evaluate the effectiveness of Independent and Internal Audits, including the verification of compliance with legal provisions and regulations applicable to the Company, in addition to the internal regulations and codes;</li> <li>c) to recommend to the Company's Management, where applicable, the correction or improvement of policies, practices and procedures identified in the exercise of its duties.</li> </ul>
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		<p>In addition to the tasks required by the Sarbanes-Oxley Law - for Companies registered with the U.S. Securities and Exchange Commission and listed on the New York Stock Exchange.</p> <p>Currently, the body is composed by five members:  Mr. Milton Matsumoto (Coordinator) - external member of the Board, but not independent. As already explained in Chapter 2, the Bank does not currently have independent members of the Board;  Mr. Paulo Roberto Simões da Cunha (Independent Member) – financial specialist, graduated in Accounting Sciences and Business Administration, whose experience is proven by his extensive professional background, since he joined the Central Bank of Brazil in 1976, in the Division of Supervision and, in 1988, being promoted to the position of Head of Division, being responsible for the oversight of Financial Institutions in São Paulo, remaining in that body until 1998. He has been a Member of the Audit Committee of Banco Bradesco S.A. since February 2014, having exercised the same role in the period from April 2004 to June 2009.  Mr. Wilson Antonio Salmeron Gutierrez (Independent Member).  Mr. Paulo Ricardo Satyro Bianchini (Independent Member)  Mr. José Luis Elias (Independent Member)</p> <p>Also, as indicated in the Second and Third Paragraphs of Article 4 of the charter of the Committee, the Body can, within the scope of its duties, hire specialized professional services.</p>
<b>4.2 Fiscal Council</b>		
4.2.1 The Fiscal Council must have its own internal regulations which describe its structure, its operation, work program, the roles and responsibilities, without creating discomfort to the individual actions of its members.	<b>Yes</b>	Not applicable
4.2.2 The minutes of the meetings of the Fiscal Council must observe the same rules of disclosure as the minutes of the Board of Directors.	<b>Yes</b>	Not applicable
<b>4.3 Independent Auditors</b>		
4.3.1 The Company shall establish a policy for hiring extra-audit services of its independent auditors, approved by the Board of Directors, which prohibits the recruitment of extra-audit services that may compromise the independence of the auditors. The company should not hire as independent auditor whoever has provided internal audit services for the company for less than three years.	<b>Partially</b>	<p>Bradesco has Specific Ruling for Hiring Independent Auditors, therein including the Policy for performance of extra-audit services. However, such a document has not been approved by the Board of Directors.</p> <p>The Audit Committee of the Organization is subordinated to the Board of Directors, being the body responsible for recommending to the Board the entities to be contracted for the rendering of independent audit services to examine the financial statements, as well as for</p>

		<p>the Actuarial Audit services, in case of Grupo Bradesco Seguros, in addition to their compensations and replacements.</p> <p>It is also responsible for evaluation of the effectiveness of the independent audit, and the Audit Committee shall also examine, in advance, the hiring of the independent auditor for the provision of other services that are not of audit of the financial statements, ensuring their independence and the observation of the existing legislation and Norms of the Profession, reporting to the Board of Directors, at least on a half-yearly basis.</p> <p>This assignment of the Committee is formalized in the First Paragraph of Article 4 of its Charter, which was approved by the Board of Directors and is publicly available on the Investor Relations website.</p>
<p>4.3.2 The independent audit team should report to the Board of Directors, through the audit committee, if any. The audit committee shall monitor the effectiveness of the work of the independent auditors, as well as their independence. It should also assess and discuss the annual work plan of the independent auditor and forward it to the appreciation of the Board of Directors.</p>	<p><b>Yes</b></p>	<p>Not applicable</p>
<p><b>4.4 Internal Audit</b></p>		
<p>4.4.1 The Company shall have an area of internal audit directly linked to the Board of Directors.</p>	<p><b>Yes</b></p>	<p>The Internal Audit of the Company, called the General Inspectorate, is directly subordinated to the Board of Directors, according to item 12.1 of the Reference Form of the Company and in accordance with the functional organizational chart publicly available on the Investor Relations website.</p>
<p>4.4.2 In the case of outsourcing of this activity, the internal audit services should not be performed by the same company that provides services for the auditing of the financial statements. The company should not hire for the internal audit anyone that has provided independent audit services to the company within less than three years ago.</p>	<p><b>Not applicable</b></p>	<p>Not applicable</p>
<p><b>4.5 Risk Management, Internal Controls and Integrity/Compliance</b></p>		
<p>4.5.1 The company must adopt the risk management policy, approved by the Board of Directors, which includes the definition of the risks to which it seeks protection, the instruments used for this purpose, the organizational structure for risk management, the assessment of the adequacy of the operational structure and internal controls in the verification of their effectiveness, in addition to defining guidelines for the establishment of acceptable limits for the company's exposure to those risks.</p>	<p><b>Yes</b></p>	<p>The policies, standards and procedures shall ensure that the Organization maintains a control structure that is compatible with the nature of its operations, the complexity of its products and services, activities, processes, systems and the size of its risk exposure. The risk and capital management policies, all approved by the Board of Directors, are aligned with the strategic objectives of the Organization, with the best national and international practices, in accordance with laws and regulations issued by the supervisory agencies, reviewed, at least annually and made available to all of the employees and companies that</p>

		<p>are associated through the Corporate portal.</p> <p>Policies of the Organization:  Corporate Governance  Credit Risk Management  Market and Liquidity Risk Management  Operational Risk Management  Underwriting Risk Management  Business Continuity Management  Procurement and Management of Outsourced Services  Corporate Sustainability  Strategic Risk Management  Capital Management  Corporate Anti-corruption  Corporate Compliance  Internal Control and Compliance Policy of Bradesco Organization</p> <p>More information is explained in detail in item 5 – Risk Management of the Reference Form of the Company.</p>
<p>4.5.2 It is incumbent upon the Board of Directors to ensure that the Board of Executive Officers has mechanisms and internal controls to understand, assess and control the risks, in order to keep them at levels consistent with the limits laid down, including the integrity/compliance program aiming at compliance with laws, rules and regulations, both external and internal.</p>	<p><b>Yes</b></p>	<p>To ensure that the guidelines established by the Board of Directors relating to risk management and compliance are appropriately implemented by the Board of Executive Officers, as mentioned above and in item 5 of the 2018 Reference Form, the Board of Executive Officers is assisted by Executive Committees, which, among their duties, suggest the limits of exposure to the respective risks and develop mitigation plans to be submitted to the Integrated Risk Management and Capital Allocation Committee and to the Board of Directors.</p> <p>Operationally, two departments are prominent in the structure of risk management/internal controls, in the second line of defense, namely the DCCE – Department of Compliance, Conduct and Ethics, and the DIRC – Department of Integrated Risk Control, in addition to the General Inspectorate (IGL), in the third line of defense.</p> <p>The DCCE has as main responsibilities to ensure the compliance of the Organization concerning Laws, regulations and self-regulations, recommendations of the supervisory bodies and Codes of Ethical Conduct (of Bradesco Organization and sector), also covering behavioral aspects and issues related to conduct and ethics. The DCIR, in turn, has the mission of promoting and facilitating control of risks and the allocation of capital, through robust practices and through the certification of existence, of execution and of effectiveness of controls to ensure acceptable levels of risks in the processes of the</p>

		<p>Organization, in an independent, consistent, transparent and integrated manner. This Department is also responsible for meeting the requirements of the Central Bank related to risk management activities. The IGL, in turn, carries out audit, inspection and consultancy services within the Organization.</p> <p>In addition to the Risk Management Policies previously mentioned, the Board of Directors approved in 2017, in line with BACEN Resolution No. 4.595/2017, the Compliance Policy and Program, which purpose is the implementation of a program of management of compliance risks, of which we can highlight as key guidelines the guarantee of means and channels for reporting, to the Board of Directors and to the Audit Committee, the results found in activities related to the function of compliance.</p> <p>It is important to highlight that to carry out diagnoses and assignments of Compliance, we have our own methodology which was drafted based on best market practices and adherent to the need for evaluation of the Legal and Infra-legal structure, which is applied to the business of Bradesco Organization.</p> <p>Bradesco Organization has Bradesco's Integrity Program, which incorporates a set of policies, standards and procedures aimed at preventing, monitoring, detecting and responding to the harmful acts provided for in Law No. 12.846/2013 and in international laws. This Program is structured to permeate all the areas of Bradesco Organization. The main operating activities and all business practices of the Organization were considered in the elaboration of the Program and are divided into strategic pillars of operation, which are the Prevention of the Risk of Corruption, the Monitoring and Detection of Inappropriate Behavior and the Response from Senior Management.</p> <p>Additional information regarding Bradesco's Integrity Program can be obtained on the Investor Relations website.</p>
<p>4.5.3 The Board of Executive Officers must assess, at least annually, the effectiveness of the policies and systems of risk management and internal controls, as well as the integrity/compliance program and be accountable to the Board of Directors on this assessment.</p>	<p><b>Yes</b></p>	<p><b><u>Risk Management Policies/Systems and Internal Controls</u></b></p> <p>The Organization has policies, rules and procedures to carry out risk and capital management. These instruments set the basic operation guidelines set by the High Management, in compliance with the integrity standards and ethical values of the institution and reach all the activities of the Conglomerate. The risk and capital management policies are in line with the strategic objectives of the Organization, best national and international practices, in compliance with the laws and regulations issued by supervisory boards, at least with annual review by the Board of Directors and provide to all employees and companies connected through the corporate intranet. The process of review consists of the assessment of the actual policy. After verifying the need to update</p>

the instrument, it is submitted to the Risk Management Executive Committees of: a) Credit, b) Market and Liquidity, c) Operational and Socio-environmental and d) Grupo Bradesco Seguros and BSP Empreendimentos Imobiliários and, later to the Capital Management Executive Committee and Board of Directors. The last annual review of the policies, with submission of updated instruments to the Committee of Integrated Risk Management and Capital Allocation, which was held on December 17, 2018, as informed in chart (5.1. Risk Management Policy) disclosed in the Reference Form.

Operation of the Organization related to Internal Controls is carried out by means of three lines of defense in which they all contribute to provide reasonable assurance that the specified goals are reached:

First line of defense – Represented by the business areas and supporting corporate areas, responsible for identifying, assessing and reporting the inherent risks as part of the day-to-day activities and for implementing corrective actions with the purpose of keeping effectiveness of controls.

Second line of defense – Represented by centralized supporting areas, responsible for setting risk and compliance management policies and procedures for the development and/or monitoring of first line of defense controls. In this line, the areas of Internal Controls, Compliance and Ethical Conduct, Legal, Corporate Assurance and others are prominent.

Third line of defense – Represented by the General Inspectorate Department (Internal Audit), responsible for assessing and reporting the efficacy of the governance, risk management and internal controls, including the form by which the first and second lines of defense accomplish their goals.

The main information on activities, assessments and diagnosis on the effectiveness of the Internal Control System is, at least annually, consolidated in a Report and submitted to the Responsible Executives, being presented to the Audit Committee, to the Internal Controls and Compliance Committee and, later on, submitted to the Board of Directors.

The Board of Directors is assisted by the organizational components named Integrated Risk Management and Capital Allocation Committee and Internal Controls and Compliance Committee.

#### **Integrity/Compliance Program**

The continuous monitoring of the Integrity Program allows the Organization to verify the effectiveness of the program, identifying any new risks that have arisen and respond in a timely manner through corrections and improvements. The monitoring is done through the collection and analysis of information from various sources, such as:

		<p>a) regular reports on the routines of the Integrity Program or on related investigations;  b) trends verified in customer complaints;  c) information obtained through the whistle blowing channels;  d) reports of governmental, regulatory or supervisory authorities;  e) internal audit reports; and  f) compliance reports.</p> <p>In addition to the analysis of existing information, the Organization evaluates if the Managers and Employees are aware of the values and policies of the Organization, if they are following the procedures laid down and if the training has brought practical results. If the non-compliance with the rules is identified or upon finding the existence of flaws that are hampering the achievement of the expected results, Bradesco Organization takes steps to remedy the problems found.</p> <p>Rendering of accounts of this assessment to the Board of Directors:</p> <ul style="list-style-type: none"> <li>- The actions pertaining to the Integrity Program are presented quarterly in the Ethical Conduct Committee, whose goal is to report to Senior Management on the progress, inconsistencies and evolution of the Program. Those actions are recorded in the Minutes.</li> <li>- The result of the investigations and diagnosis of Compliance shall be submitted on a quarterly basis to the Internal Controls and Compliance Committee, as well as the monitoring of action plans declared by the managers for the diagnosed deficiencies.</li> </ul> <p>The Compliance Corporate Policy was reviewed by the Board of Directors on March 20, 2019, the Anticorruption Corporate Policy was reviewed on June 3, 2019 and the Integrity Program was reviewed on August 6, 2018.</p>
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**5. Ethics and Conflict of Interests**

**5.1 Code of Conduct and Whistle Blowing Channel**

<p>5.1.1 The Company shall have a conduct committee, which is independent and autonomous and linked directly to the Board of Directors, responsible for the implementation, dissemination, training, review and update of the code of conduct and of the whistle blowing channel, as well as for the investigations and filing of corrective measures relating to breaches of the code of conduct.</p>	<p><b>Yes</b></p>	<p>The Company has the Integrity and Ethical Conduct Committee, established in 2003 and subordinated to the Board of Directors, which purpose is to propose actions with respect to the dissemination and compliance with the Codes of Ethical Conduct of Bradesco Organization, corporate and sector-based, and to the rules of conducts related to the themes of anti-corruption and competition, in order to ensure the efficiency and effectiveness thereof.</p> <p>The Committee is currently composed of the following members:</p>
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		<p><b>Coordinator</b> Carlos Alberto Rodrigues Guilherme – Member of the Board of Directors</p> <p><b>Members</b> Milton Matsumoto – Member of the Board of Directors Alexandre da Silva Glüher – Member of the Board of Directors Josué Augusto Pancini – Member of the Board of Directors Maurício Machado de Minas - Member of the Board of Directors Octavio de Lazari Junior – Chairman Marcelo de Araújo Noronha - Executive Officer Vice-Chairman André Rodrigues Cano - Executive Officer Vice-Chairman Glaucimar Peticov – Assisting Executive Officer Clayton Camacho – Department Officer Edilson Wiggers - Department Officer Frederico William Wolf - Department Officer Nairo José Martinelli Vidal Júnior - Officer</p> <p>Its Charter, with the duties of the Bodies and other information related to the dissemination and compliance with the Codes of Ethical Conduct, of the rules of conduct related to the anti-corruption and competitive issues, in addition to the composition are publicly available in the area of the Investor Relations website.</p>
<p>5.1.2 The code of conduct, drawn up by the Board of Executive Officers, with the support of the conduct committee, and approved by the Board of Directors, shall: (i) regulate the internal and external relations of the company, expressing the commitment expected of the company, of its directors, officers, shareholders, employees, suppliers and stakeholders with the adoption of appropriate standards of conduct; (ii) manage conflicts of interests and provide for the abstention of a member of the Board of Directors, of the audit committee or of the conduct committee, if any, that, as the case may be, is in conflict; (iii) clearly define the scope and range of actions to ascertain the occurrence of situations understood as performed with the use of privileged information (for example, the use of insider information for commercial purposes or for obtaining advantages in the trading of securities); (iv) establish the ethical principles that justify the negotiation of contracts, agreements, proposals for the amendment of the bylaws, as well as the policies that guide the entire company, and establish a maximum value of goods or services of third parties that managers and employees may accept gratuitously or as a beneficiary.</p>	<p><b>Yes</b></p>	<p>Not applicable</p>

<p>5.1.3 The whistle blowing channel should have independence, autonomy and impartiality, putting in place guidelines of operation defined by the Board of Executive Officers and approved by the Board of Directors. It must be operated independently and impartially, and guarantee the anonymity of its users, in addition to promoting, in a timely manner, the investigations and necessary measures. This service may be exercised by a third party of recognized capacity.</p>	<p><b>Yes</b></p>	<p>As stated in item 5.3 of the Code of Ethical Conduct of Bradesco Organization, a document, as already mentioned, duly approved by the Board of Directors, when situations should arise or suspicious of violation of the Codes of Ethical Conduct, the notification thereof must be made promptly to the channel <a href="mailto:etica@bradesco.com.br">etica@bradesco.com.br</a>, taking into account that the contents of the allegations, anonymous or not, must always be as complete as possible, to enable the investigation of facts and, if possible, accompanied by documents and other elements that confirm them. The right of whistle blowing guarantees anonymity, whereby retaliation to the whistleblower in good faith is forbidden.</p> <p>In addition to this channel, a list of all other channels available to employees or stakeholders who are aware of violations of Codes of Ethical Conduct is available on the Investor Relations website.</p>
<p><b>5.2 Conflict of Interests</b></p>		
<p>5.2.1 The rules of governance of the company shall ensure the separation and clear definition of tasks, roles and responsibilities associated with the offices of all the agents of governance. The seniority for decision in each instance should also be defined, with the purpose of minimizing possible objects of conflicts of interests.</p>	<p><b>Yes</b></p>	<p>The rules of governance of the Company are established, mainly in the following corporate documents:</p> <ul style="list-style-type: none"> <li>Bylaws, which defines the roles, duties and seniority for approval of each one of the management bodies of the Company;</li> <li>Charter of the Board of Directors, which determines the roles, duties and seniority for approval of the body, also determining abstention of the director in case of matters involving conflicts of interest;</li> <li>Charter of the Board of Executive Officers, which defines the roles, duties and seniority for approval of the related body and of each Officer, individually;</li> <li>Charter of the Fiscal Council, which defines the roles, duties and responsibilities of the Fiscal Council;</li> <li>The Code of Ethical Conduct, which establishes that in view of any conflict of interest, the manager, employee or stakeholder must promptly inform the fact to his/her superior and peer(s) involved and not engage, even physically, in discussions and deliberations on the referred theme;</li> <li>Sector Code of Ethical Conduct, which establishes the responsibilities and the stance that must govern the actions of professionals from various areas of the Organization;</li> <li>Regulation of the Committees subordinated to the Board of Directors, which defines their roles, duties and competences;</li> <li>Regulation of the Executive Committees subordinate to the CEO, which defines their roles, duties and competences; and</li> <li>Corporate Policies and Standards.</li> </ul>

		<p>Each of these documents establishes the duties, roles, responsibilities and seniority for decision of governance bodies of the Company and their members.</p> <p>The mentioned regulations are publicly available on Bradesco' Investor Relations website, except for the regulations of the executive committees, which are available internally on our Corporate Portal.</p>
<p>5.2.2 The governance rules of the company must be made public and determine that the person who is not independent in relation to the matter under discussion or deliberation in the management and supervisory bodies of the company must demonstrate, in a timely manner, their conflict of interest or particular interest. If they fail to do so, these rules should provide that another person expresses the conflict, if they are aware, and that, as soon as the conflict of interest is identified in relation to a specific theme, the person involved avoids, even physically, the discussions and deliberations. The rules shall provide that this temporary withdrawal is recorded in the minutes.</p>	<p><b>Partially</b></p>	<p>Among the corporate documents that dictate the rules of governance, three express clearly the guidelines to be followed in the event of the existence of conflicts of interest:</p> <ul style="list-style-type: none"> <li>- The Code of Ethical Conduct, in item 4.1.1, establishes that in view of any conflict of interest, the manager, employee or stakeholder must promptly inform the fact to his/her superior and peer(s) involved and not engage, even physically, in discussions and deliberations on the referred theme.</li> <li>- Both the Charter of the Board of Directors and that of the Board of Executive Officers deal with the theme, in the context of the Body, stating that the Managers must intervene in any corporate operation in which they have a conflicting interest with that of the Company or with any company of Bradesco Organization and deliberate in the presence of any conflict of interest, being incumbent upon them to report their impediment and withdraw, even physically, from discussions and deliberations in relation to the specific theme, recording the withdrawal in the minutes.</li> </ul> <p>However, there is currently no formalization in the mentioned documents that if the affected persons do not express themselves, that another person can do so, if aware of the fact. Said practice will be included in the next revision of the Code of Ethical Conduct of Bradesco, so as to include Managers, Employees and Stakeholders.</p>
<p>5.2.3 The company must have mechanisms to manage conflicts of interests in the votes submitted to the shareholders' meeting, to receive and process allegations of conflicts of interest, and the cancellation of votes cast in the conflict, even if subsequently to the meeting.</p>	<p><b>Yes</b></p>	<p>Bradesco formally has and discloses, on the Investor Relations website, a communication channel (governancacorp@bradesco.com.br) through which the shareholders have the possibility of sending (i) both recommendations to be included in the agendas of the Meetings and (ii) allegations of conflict of interests in the voting submitted. Both cases are submitted to the analysis and decision of the Board of Directors.</p> <p>The contacts made are submitted to the Board of Directors for consideration and decision regarding the cancellation of votes cast in conflict, even if subsequently to the meeting. Therefore, the purpose is to prevent the abuse of the right to vote and conflict of interests within the scope of the shareholders' meeting, as established in Article 115 of the Corporations Law.</p>
<p><b>5.3 Transactions with Related Parties</b></p>		

<p>5.3.1 The Bylaws must define which transactions with related parties must be approved by the Board of Directors, excluding any members with potentially conflicting interests.</p>	<p><b>No</b></p>	<p>The Bylaws do not establish which transactions with related parties must be approved by the Board of Directors, but the Company has a Policy of Transactions with Related Parties, approved by the Board of Directors on August 15, 2008, which fully complies with the normative bases on the topic. In addition, our Executive Committee of Accounting Practices Management approved, on March 25, 2015, the document entitled Practice of Transactions with Related Parties.</p>
<p>5.3.2 The Board of Directors shall approve and implement a policy of transactions with related parties, which includes, among other rules: (i) provision that, prior to the approval of specific transactions or guidelines for contracting transactions, the Board of Directors should request to the Board of Executive Officers market alternatives for the transaction with the concerned related parties, adjusted by the risk factors involved; (ii) prohibition of forms of compensation of advisers, consultants or intermediaries that generate conflict of interests with the company, with the managers, with the shareholders or with classes of shareholders; (iii) prohibition on loans in favor of the controller and of the managers; (iv) the hypotheses of transactions with related parties must be based on independent assessment reports, drawn up without the involvement of any party involved in the referred transaction, be it a bank, lawyer, specialized consulting firm, among others, based on realistic assumptions and information endorsed by third parties; (v) that the corporate restructuring involving related parties shall ensure equal treatment for all shareholders.</p>	<p><b>Yes</b></p>	<p>The Organization totally follows all the normative bases defined by the regulating agencies and additionally has internal controls and standards aiming at: (i) ensuring that transactions with related parties are carried out in a commutative manner; (ii) ensuring that transactions with related parties are in compliance with the legal standards and other regulations and internal policies; (iii) ensuring that transactions are properly formalized, and disclosed, ensuring the transparency of the process to our shareholders, investors and to the market in general.</p> <p>In addition, we maintain, as a compulsory procedure, the Monthly Certification (internal document) by the managers of the Departments and Related Companies which certify that the transactions between "Related Parties", when performed, are in compliance with both the Policy and with the Practices of Transactions with Related Parties, available on Bradesco's Investor Relations website.</p>
<p><b>5.4 Policy on Trading of Securities</b></p>		
<p>5.4.1 The company shall adopt, by resolution of the Board of Directors, the securities trading policy it has issued, which, without prejudice to the observance of the rules laid down by the CVM regulations, establishes controls that allow the monitoring of negotiations made, as well as the investigation and punishment of those responsible in the event of noncompliance with the policy.</p>	<p><b>Partially</b></p>	<p>The Policy on Trading of Securities issued by Bradesco was approved by the Board of Directors on July 29, 2002 and covers its direct and indirect Controlling Shareholders, members of the Board of Directors, Officers, members of the Fiscal Council, as well as members of any bodies with technical or advisory functions, created by the company's bylaws, and all of those who, by virtue of their office, function or position in Bradesco or its affiliates, are aware of any information that concerns the material acts or facts.</p> <p>The mentioned Policy establishes that signatures must be obtained on the "Term of Adherence to the Instrument of Policies of Disclosure of the Material Act or Fact and Trading of Securities Issued by Banco Bradesco S.A." of the members of the Board of Directors, Officers, members of the Fiscal Council, as well as the members of any agency with technical or consulting functions created by statutory provision, and all those who, by virtue of their office, function or position in Bradesco or in associated companies, are aware of information regarding material acts or facts. The signing of the term, in itself, is already a mechanism of awareness of those involved about the need for ethics, transparency and equality in the trading of securities of the company.</p>

In addition to the Policy, there is also the Corporate Standard for Mergers and Acquisitions of Bradesco Organization that defines a mechanism by means of which:

- those involved in processes of corporate restructuring that generate material facts to the market should sign the term of adherence;
- the advisory facility of the Executive Committee of Mergers and Acquisitions should keep under its custody, along with the process of the Corporate operation, a list of those who became aware thereof prior to its disclosure to the market, also as a form of control of trading during impeditive periods.

Furthermore, each year all of the statutory managers, as well as the members of bodies provided for in the Bylaws (Audit Committee, Remuneration Committee and Ombudsman) receive a calendar of events including the dates of disclosure to the market of the Company's results, as well as the period of silence for each disclosure, so that they become aware of the periods in which they will be blocked, by Corretora Bradesco (Stock Broker), for the trading of securities of the Bank. As to the material facts, according to the internal mechanisms, 15 days in advance all managers and other people who are aware of them shall also be blocked.

In accordance with the Second Paragraph of Article 13 of CVM Instruction No. 358, the prohibition of trading is applied to all managers who leave the management of the company before the public disclosure of business or fact initiated during their management period, extended for a period of six months after their leave. For this purpose, the Manager of Bradesco, at the time he/she leaves the Organization, signs a document stating they are aware of the legal provision governing the matter, which document is filed at the Company's Headquarters, for all intents and purposes of the law.

To investigate possible breaches, the Company consults both the custodian and their brokers during the impeditive periods, in order to make sure that there was no failure of blockage in the impeditive period. If negotiation is identified by people who, by legal provisions, should be prohibited from trading in the period prior to the disclosure of the fact, which usually occurs due to the trading of securities in a Stock Broker other than the brokers that are members of the Bradesco Organization, the Company always advises them to trade through Bradesco Corretora or Ágora Corretora, companies of the Bradesco Organization.

## 5.5 Policy on Contributions and Donations

<p>5.5.1 In order to ensure greater transparency regarding the use of company resources, a policy must be drawn up on its voluntary contributions, including those related to political activities, to be approved by the Board of Directors and implemented by the Board of Executive Officers, containing clear and objective principles and rules.</p>	<p><b>Yes</b></p>	<p>The contributions and donations made by the Organization are governed by the Standard for Donations and Sponsorships and by the Anti-corruption Policy and Standard, documents that are approved by the Board of Directors.</p> <p>The Organization has a Corporate Policy on Donations, approved by the Board of Directors on March 12, 2018, made available on the Investor Relations website of the Company. In addition there is a Standard for Donations and Sponsorship which was approved by the Board of Executive Officers in January 2018, whose wording was ratified by the Board of Directors in a meeting held on January 29, 2018. The document is not publicly available, but is available to all the stakeholders on the Corporate Portal.</p> <p>In turn, the Corporate Anti-corruption Policy was approved by the Board of Directors on February 24, 2014, and made publicly available on the company's Investor Relations website.</p> <p>The Anti-corruption Standard, in turn, was approved in the scope of the Board of Executive Officers on May 2, 2014, and is only available internally, on the Corporate Portal.</p>
<p>5.5.2 The policy must provide that the Board of Directors is the body responsible for the approval of all disbursements related to political activities.</p>	<p><b>No</b></p>	<p>The Standard for Donations and Sponsorships, according to the applicable law, prohibits any kind of contribution to parties and candidates in electoral campaigns, by companies of Bradesco Organization.</p>
<p>5.5.3 The policy on voluntary contributions of companies controlled by the State, or that have repeated and relevant trade relations with the State, must prohibit contributions or donations to political parties or people linked to them, even if permitted by law.</p>	<p><b>Not applicable</b></p>	<p>Not applicable</p>