



**BANCO DO ESTADO DO RIO GRANDE DO SUL S.A.**

**Securities Trading Policy of Banco do Estado do Rio Grande do Sul S.A.**

## **BANRISUL SECURITIES TRADING POLICY**

The Bank's Securities Trading Policy is presented below:

### **1. OBJECTIVE**

We present below the Securities Trading Policy of Banco do Estado do Rio Grande do Sul – Banrisul, which determines the procedures and guidelines that shall be adopted by all employees and related persons, in compliance with the norms and/or legislation established by the Regulating Bodies or statutory provisions, ensuring trading transparency and equal treatment in all Banrisul securities trading operations, who shall be considered “persons prevented from trading” for future positions as of the date of disclosure of this Policy.

### **2. PERSONS SUBJECT TO THE POLICY**

The Banrisul Securities Trading Policy must be complied with and respected by the following group, considered “persons prevented from trading”:

- a) Controlling shareholders;
- b) Members of the Boards of Directors of Banrisul, its subsidiaries and/or affiliated companies;
- c) Members of the Executive Boards of Banrisul and of its subsidiaries and/or affiliated companies;
- d) Members of the Audit Committees of Banrisul, its subsidiaries and/or affiliated companies;
- e) Members of the Fiscal Councils of Banrisul, its subsidiaries and/or affiliated companies;
- f) Members of the Compensation Committees of Banrisul, its subsidiaries and/or affiliated companies;
- g) Employees of Banrisul, its subsidiaries and/or affiliated companies;
- h) Employees of Banrisul, its subsidiaries and/or affiliated companies who maintain a commercial and/or professional relation with third parties (independent auditors, consulting firms and/or third parties); and
- i) Interns of Banrisul, its subsidiaries and/or affiliated companies.

### **3. DEFINITIONS**

Privileged information or material facts comprise any decision/information that may impact the prices of securities issued by Banrisul and that were resolved in:

- a) Shareholders' Meetings;
- b) Board of Directors' Meetings;
- c) Board of Executive Officers' Meetings;
- d) Audit Committee's Meetings;
- e) Fiscal Council's Meetings;
- f) Compensation Committee's Meetings; and
- g) Meetings of the Board of Executive Officers' technical and advisory bodies, in compliance with statutory provisions of Banrisul, its subsidiaries and/or affiliated companies.

#### **4. RESTRICTIONS ON BANRISUL SECURITIES TRADING**

Persons prevented from trading are forbidden to acquire or sell securities issued by Banrisul in the following situations:

- a) 30 days prior to the disclosure of the Quarterly and Annual Information (ITRs and DPFs, respectively) and of corporate events, according to the disclosure dates available on the websites of the Company and of the Brazilian Securities and Exchange Commission (CVM);
- b) no more than 90 days for acquirers; and
- c) whenever he/she becomes aware in advance of a material act or fact disclosed by Banrisul.

#### **5. LIABILITY**

In case of non-compliance with the prohibitions mentioned in item 4, persons prevented from trading shall be subject to the penalties provided for in the Personnel Regulations of Banrisul, its subsidiaries and/or affiliated companies. Non-compliance includes benefitting themselves or others and not ensuring that subordinates and third parties keep said information confidential. Said persons shall also reimburse Banrisul and related persons of all losses resulting directly or indirectly from such non-compliance.

#### **6. CONFIDENTIAL INFORMATION**

Persons prevented from trading must keep confidential all information related to any material act or fact they become aware of, subject to the penalties of the Personnel Regulations in case of non-compliance.

#### **7. ADHESION TO THE POLICY**

Persons prevented from trading shall be informed electronically (Standardized Form) of the Banrisul Securities Trading Policy by the Personnel Management Committee and shall declare to have acknowledged and to be in compliance with all the terms therein.

The respective form shall be under the responsibility of and filed at the Personnel Management Committee.

The Personnel Management Committee shall be responsible for updating the Personnel Regulations to include the penalties and responsibilities approved in the Banrisul Securities Trading Policy.

#### **8. FINAL PROVISIONS**

- a) The Investor Relations Officer is responsible for the implementation of the Banrisul Securities Trading Policy and shall be available to provide any clarifications necessary;
- b) The Banrisul Securities Trading Policy shall become effective after approval by the following instances:
  - ✓ Risk Committee and Internal Control Committee;
  - ✓ Banking Management Committee;
  - ✓ Board of Executive Officers' Meeting; and
  - ✓ Board of Directors' Meeting.
- c) The Banrisul Securities Trading Policy shall be submitted to the subsidiaries and/or affiliated companies for acknowledgement and adjustments to its preparation and disclosure, if necessary;

- d) Following the procedures above, the Banrisul Securities Trading Policy shall be:
- ✓ submitted to the BM&FBOVESPA;
  - ✓ submitted to the Brazilian Securities and Exchange Commission (CVM);
  - ✓ disclosed on the Bank's website;
  - ✓ submitted to the Brazilian Central Bank (BACEN); and
- e) The Investor Relations, Capital Markets and Corporate Governance Unit shall be responsible for monitoring, controlling and ensuring compliance with the Policy, which also applies to the subsidiaries and/or affiliated companies Banrisul S.A. Administradora de Consórcios, Banrisul S.A. Corretora de Valores Mobiliários e Câmbio and Banrisul Serviços Ltda. The companies Banrisul Armazéns Gerais S.A. and Credimatone Promotora de Vendas e Serviços S.A. are responsible for monitoring and controlling the Banrisul Securities Trading Policy.