

**REPORT ON THE BRAZILIAN CORPORATE GOVERNANCE CODE
MULTIPLAN EMPREENDIMENTOS IMOBILIÁRIOS S.A.**

Reference Date: July 31, 2025

Recommended Practice	Adopted?	Explanation
1.1.1 - The share capital should be comprised only of common shares.	Yes	<i>By answering "Yes" to this item, it is not possible to include an explanation in the Report.</i>
1.2.1 - Shareholders' agreements should not bind the exercise of voting rights of any members of management or supervisory and control bodies.	Not applicable	Not applicable

Recommended Practice	Adopted?	Explanation
1.3.1 - The executive management should use the shareholders' meeting to communicate how the company's business is being conducted, for which reason management should publish a handbook with the purpose of facilitating and stimulating participation in shareholders' meetings.	Yes	<i>By answering "Yes" to this item, it is not possible to include an explanation in the Report.</i>
1.3.2 - Minutes should enable full understanding of the discussions occurred during the meetings, even if they are recorded in summary form, and identify the votes cast by the shareholders.	Yes	<i>By answering "Yes" to this item, it is not possible to include an explanation in the Report.</i>
1.4.1 - The board of directors should conduct a critical analysis of the advantages and disadvantages of the anti-takeover mechanism and its characteristics, and especially of the triggers and price parameters, if applicable, providing the related explanations.	Yes	<p>The mechanism for the protection of the shareholding dispersion set forth in the Company's Bylaws was adopted in 2006, in the context of the bylaws' amendment that aimed to prepare the Company for IPO and listing in differentiated governance segments. At the time, the Company's shareholders and management analyzed the advantages and disadvantages of adopting the measure, in light of the economic environment and trends in the Brazilian capital market, and chose to establish a mechanism for the protection of the shareholding dispersion that requires a public tender offer of shares ("OPA") to the one who acquire or become owner of shares issued by the Company in a quantity equal to or greater than 20% of its shares.</p> <p>Therefore, the prospectus of the initial public offering of the Company (IPO), in 2007, and, thereafter, the prospectus of the subsequent offer, in 2009, addressed the issue, clarifying that the mechanism has the effect of avoiding the concentration of shares issued by the Company in the hands of a small group of investors, in order to promote a more dispersed shareholder base and to explain their characteristics, triggers and price parameters.</p> <p>Since then, there has been no opportunity for further critical analysis of the defense measure and its characteristics to be required by the Board of Directors.</p>
1.4.2 - Provisions that prevent removal of the measure from the bylaws, the so-called "entrenched clauses", should not be used.	No	<p>Article 50, Paragraph 12 of the Bylaws provides that: <i>"Any amendment that restricts the shareholders' right to perform the OPA set forth in this Article or the exclusion of this Article shall oblige the shareholder(s) who has(ve) voted such amendment or exclusion in the resolution passed by the Shareholders' Meeting to perform the OPA set forth in this Article"</i></p> <p>The deletion of this "entrenched clause" involves complex legal aspects. Notwithstanding CVM Orientation Opinion No. 36/2009, to exclude the application of penalties to shareholders who vote for the suppression or alteration of the stock dispersion protection mechanism, it can not be ruled out that an arbitration decision could adopt an understanding contrary to said Opinion, determining that the shareholders who vote in favor of the suppression must conduct the OPA in the manner set forth in Article 50 of the Bylaws.</p>

Recommended Practice	Adopted?	Explanation
<p>1.4.3 - If the bylaws determine that a tender offer should be carried out, whenever a shareholder or group of shareholders directly or indirectly achieves significant participation in the voting capital, the rule for determination of the offer price should not impose addition of premiums substantially greater than the economic value or market value of the shares.</p>	<p>Partially</p>	<p>The rule for determining the price of the OPA in article 50, paragraph 3 of the Bylaws provides that the purchase price of each share issued by the company may not be less than the higher amount between: (i) the economic value assessed in the appraisal report; (ii) 150% of the issue price of the shares in any capital increase through a public distribution occurred in the period of 24 months prior to the date of compulsory implementation of the OPA by share dispersion, duly updated by the IGP-M until the time of payment; and (iii) 150% of the average unitary price of the company's common shares during the period of 90 days preceding the implementation of the OPA in the stock market in which there is the largest trading volume of the company's shares. The Company understands that, in general, such parameters are reasonable and do not represent a substantial premium, since the adoption of a minimum price in clauses protecting the stock dispersion is a widespread practice among publicly held companies whose main benefit is to discourage unsolicited and opportunistic acquisition offers.</p>
<p>1.5.1 - The company's bylaws should provide that: (i) transactions where there is direct or indirect transfer of control should be followed by a tender offer directed to all shareholders, for the same price and in the same conditions obtained by the selling shareholder; (ii) management should issue an opinion on the terms and conditions of corporate reorganizations, capital increases, and other transactions that result in change of control, and state whether they ensure fair and equitable treatment to the company's shareholders.</p>	<p>Yes</p>	<p><i>By answering "Yes" to this item, it is not possible to include an explanation in the Report.</i></p>
<p>1.6.1 - The bylaws should provide that the board of directors should issue an opinion in relation to any tender offer related to shares and securities convertible into or exchangeable for shares of the company, which shall contain, among other relevant information, opinion of the board of directors on the acceptance of the tender offer and on the company's economic value.</p>	<p>Yes</p>	<p><i>By answering "Yes" to this item, it is not possible to include an explanation in the Report.</i></p>

Recommended Practice	Adopted?	Explanation
<p>1.7.1 - The company should prepare and disclose a profit allocation policy established by the board of directors. Among other aspects, such policy should provide the frequency of payments and the reference parameter to be used for definition of the related amount (percentage of the adjusted net profit and of the free cash flow, among others).</p>	<p>No</p>	<p>The Company does not have a formally approved policy for results allocation.</p> <p>For additional information on the Company's history of allocation of results in the last 3 fiscal years, see Item 2.7 of the Company's Reference Form (version 1.0, filed on May 30,2025).</p>
<p>1.8.1 - The bylaws should clearly and precisely identify the public interest that justified the creation of the mixed-capital company, in a specific chapter.</p>	<p>Not applicable</p>	<p>Not applicable.</p>
<p>1.8.2 - The board of directors should monitor the company's activities and establish policies, mechanisms, and internal controls for verification of any costs of serving the public interest and any refunds to the company or other shareholders and investors by the controlling shareholders.</p>	<p>Not applicable</p>	<p>Not applicable.</p>

Recommended Practice	Adopted?	Explanation
<p>2.1.1 - The board of directors, without prejudice to other legal or statutory attributions and to other practices foreseen in this Code, should: (i) define business strategies, taking into consideration the impacts of the company's activities on society and the environment, seeking the company's continuity and long-term value creation; (ii) periodically assess the company's risk exposure and effectiveness of the risk management systems, internal controls, and of the integrity/compliance system, and approve a risk management policy compatible with the business strategies; (iii) define the company's values and ethical principles and ensure the company's transparency maintaining the relationship with all stakeholders; (iv) annually review the corporate governance system and seek improvement thereof.</p>	<p>Yes</p>	<p>For information on the performance of the Board of Directors with regard to sustainability, risk management, integrity, ethics and governance, see items 5.1, 5.3, 5.4, 1.9 and 7.2 (c) of the Company's Reference Form. Company (version 1.0, filed on May 30, 2025).</p> <p>It is important to highlight that Multiplan annually discloses its economic, financial, social, and environmental results through the publication of its Annual Report. The latest report available up to this date, regarding 2023, is available on the Empresas.NET System, accessible on the CVM's website on the world wide web, and on the Company's investor relations website (http://ri.multiplan.com.br/).</p>
<p>2.2.1 - The bylaws should provide that: (i) the board of directors should be composed of a majority of external members, where at least one third shall be independent members; (ii) the board of directors should assess and disclose annually who the independent members are, as well as indicate and justify any circumstances that could compromise their independence.</p>	<p>Partially</p>	<p>The Company's Bylaws reflect the parameters of the Level 2 Governance Rules of B3 S.A. - Brasil, Bolsa, Balcão, special corporate governance segment in which the Company is listed. Accordingly, Article 15 of the Bylaws establishes that the Board of Directors must be composed of, at least, 20% of independent members. Furthermore, the Company is subject to § 2 of Article 140 of Law 6,404/76, regulated by CVM Resolution 168/22, which determines that publicly-held companies in category A that have certain characteristics must observe the minimum criterion of 20% of independent members on the Board of Directors. Currently, the Company's Board of Directors is made up of 42,8% independent members. Although the Company's Bylaws does not foresee a reserve of seats for external members, they represent the majority of the makeup of the Company's Board of Directors. Moreover, it should be noted that, when the General Meetings are called to elect members of the Board of Directors, the Company provides all the information made available to it regarding the candidates in the documents attached to management's proposals and the characterization of the nominee for the Board of Directors as an independent member is decided by the general meeting, based on a statement from the Company's Board of Directors, included in the management proposal, as well as a statement sent by the nominee attesting to his/her compliance with the independence criteria, in accordance with the applicable legislation and regulations.</p>

Recommended Practice	Adopted?	Explanation
2.2.2 - The board of directors should approve an appointment policy establishing: (i) the procedure for appointment of the members of the board of directors, including indication of participation in other corporate bodies of the company in such proceeding; (ii) that the board of directors should be composed taking into consideration the time availability of its members for exercise of their duties and diversity of knowledge, experiences, conducts, cultural aspects, age, and gender.	No	The process of nominating candidates to the Board of Directors and the characteristics applicable to the electoral process are provided for, pursuant to Law No. 6.404/1976 and the regulations issued by the Brazilian Securities and Exchange Commission (CVM Resolution 80/2022 and CVM Resolution No. 81/2022), as well as in the recommendations under CVM/SEP Annual Circular Letter. In addition, the Company is listed in the Level 2 Governance Rules of B3 and, therefore, follows the differentiated governance rules provided for in the respective Regulation. In this scenario, the relevant guidelines are disclosed at the convening of the General Meetings. For these reasons, up to the present moment, it has not been necessary to formalize an appointment policy. It should be noted, however, that the Company's management is constantly conducting studies and discussions designed to improve corporate governance practices.
2.3.1 - The CEO should not accumulate the position of chairman of the board of directors.	Yes	<i>By answering "Yes" to this item, it is not possible to include an explanation in the Report.</i>
2.4.1 - The company should implement an annual performance evaluation process for the board of directors and its committees, for the board members, considered individually, and of the governance department, if any.	No	The Company does not adopt a formal procedure for evaluating the performance of the Board of Directors. The performance evaluation of the members of the Board of Directors of the Company rests essentially with the shareholders, who have the power to elect and dismiss them, which occurs at least every two years, upon the end of the members' terms of office. In addition, the Company works through long-term projects focused on quality, so that short-term evaluations are not aligned with the Company's value generation strategy.
2.5.1 - The board of directors should approve and continuously update a succession plan for the CEO, preparation of which should be coordinated by the chairman of the board of directors.	No	Although it does not have a formal succession plan approved by the Board of Directors, the Company adopts continuous training, development and hiring actions so that it can have on its staff or can recruit on a timely basis in the market, when necessary, professionals prepared to assume key positions, including the position of chief executive officer. In this sense, the Company has means that enable organized and well-structured transitions, such as the one that occurred in the position of Chief Executive Officer, in February 2023, when Mr. José Isaac Peres, after serving for almost 50 years as Chief Executive Officer of the Company, was succeeded in the role by Mr. Eduardo Kaminitz Peres.
2.6.1 - The company should have an integration program for new members of the board of directors, structured in advance, so that such members are introduced to the company's key people and facilities, and which addresses issues that are key for understanding the company's business.	Yes	The process for the integration of new Company board members involves: (i) the presentation of new members to their peers and to the Company's main executives, seeking to create and maintain constant interaction between them; (ii) visits to the Company's facilities and its main projects, designed to demonstrate the operation of its activities on-site; and (iii) an understanding of the Company's values, mission and practices, including adherence to its policies.

Recommended Practice	Adopted?	Explanation
2.7.1 - The compensation of the members of the board of directors should be proportional to the attributions, responsibilities and time demands. There should be no compensation based on meeting attendance and the variable compensation of the members of the board, if any, should not be tied to short-term results.	Yes	<i>By answering "Yes" to this item, it is not possible to include an explanation in the Report.</i>
2.8.1 - The board of directors should have a charter that sets forth its responsibilities, attributions, and rules of operation, including: (i) the attributions of the chairman of the board of directors; (ii) the rules for replacement of the chairman of the board of directors in the event of absence or vacancy; (iii) the measures to be adopted in the event of conflicts of interest; and (iv) definition of a suitable advance term for receipt of the material for discussion at meetings, in appropriate detail.	Partially	The information contained in the aforementioned internal regulations is sufficiently incorporated into the Bylaws and the Company's Code of Conduct, documents available on the Company's Investor Relations page and on the website of the Brazilian Securities and Empresas.NET system. For more information, see item 7.2 of the Company's Reference Form (version 1.0, filed on May 30, 2025).
2.9.1 - The board of directors should establish an annual calendar with the dates of the ordinary meetings, which should not be less than six and more than twelve, in addition to calling extraordinary meetings, whenever necessary.	Yes	<i>By answering "Yes" to this item, it is not possible to include an explanation in the Report.</i>
2.9.2 - The meetings of the board of directors should foresee regular exclusive sessions for external board members, without the presence of the executive management members and other guests, for alignment of the external board members and discussion of topics that could lead to any awkwardness.	Partially	The Company provides infrastructure and ensures a free interaction environment so that the members of the Board of Directors may, whenever they deem it necessary or opportune, communicate or meet each other in the manner which they deem most appropriate, although no exclusive meetings for external members are foreseen on the calendar. In addition, the Company adopts rules for situations of conflict of interests that, as applicable, guides the conduct of directors in discussions involving matters that may cause embarrassment.

Recommended Practice	Adopted?	Explanation
2.9.3 - The minutes of the meetings of the board of directors should be written in clear language, record the resolutions taken, the persons in attendance, the split votes, and any abstentions.	Yes	Regarding the practice indicated in Item 2.9.3, the Company informs that it follows the recommendation, according to the minutes of the Board of Directors' meeting regularly disclosed through the investor relations channels and the IPE System.
3.1.1 - The executive management, without prejudice to its other attributions provided by law, the bylaws and other practices set forth in the Code, shall: (i) implement the risk management policy and, when necessary, propose to the board of directors any necessary revision of such policy, as a result of changes in the risks to which the company is exposed; and (ii) implement and maintain effective procedures and programs for monitoring and disclosure of the financial and operating performance and of the impacts of the company's activities on society and the environment.	Yes	<i>By answering "Yes" to this item, it is not possible to include an explanation in the Report.</i>
3.1.2 - The executive management should have an exclusive charter that establishes its structure, operation and its roles and responsibilities.	Partially	The activities of the Company's management are foreseen in the Bylaws, in the applicable legislation and regulations. The organizational structure adopted as a model of governance and basis for the Company's risk management includes, among other aspects, segregation of functions, collegiate decisions, assignment of responsibilities, continuous monitoring, classification, handling and need for redundancy. With the assistance and direction of the Compliance area, the directors are responsible for managing the risks related to their organizational units, disseminating and monitoring the application of risk management procedures within their respective areas. Thus, the Company understands that the structure, functioning, roles and responsibilities of the board of directors are satisfactorily foreseen in the set of norms indicated above, and, therefore, does not see a need or benefit in adopting its own internal regulations. For more information, see https://ri.multiplan.com.br/en/corporate-governance/management/ .
3.2.1 - There should be no reservation of executive positions or managerial positions for direct appointment by shareholders.	Yes	<i>By answering "Yes" to this item, it is not possible to include an explanation in the Report</i>

Recommended Practice	Adopted?	Explanation
3.3.1 - The CEO should be evaluated, on an annual basis, in a formal process conducted by the board of directors, based on achievement of financial and non-financial performance goals established by the board of directors for the company.	Yes	The Company's Chief Executive Officer is evaluated annually by the Board of Directors, in an intrinsic process to determine its annual bonus, which takes into account, beyond the individual performance of the executive, the Company's financial and non-financial performance, whose targets are set out in the annual business plan (budget) submitted at the beginning of each year to the Board of Directors. In the year of 2025, the Board of Directors Meeting regarding the annual business plan and the meeting regarding the 2024 bonus was held on February 06, 2025.
3.3.2 - The results of the evaluation of the other officers, including the CEO's propositions regarding the goals to be agreed and the permanence, promotion or dismissal of the executives in relation to their respective positions, should be submitted to, reviewed, discussed and approved by the board of directors.	Yes	The performance of the Company's executive officers is continuously monitored and evaluated at the meetings of the Board of Directors. The results of the members of the Company's executive board are analyzed, discussed and deliberated, especially, in the context of the evaluation of the proposal for annual global compensation of the Company's managers. The proposals of the CEO on the goals and permanence, promotion or dismissal of the members of the Company's executive board are subject of discussion by the members of the Board of Directors at the meeting that deliberates on the annual business plan (budget) and, at least, every two years at the meeting that appoints the directors and establishes their respective duties. With respect to the current term of office of the executive officers, the meetings of the Board of Directors that dealt with these matters were held on: May 03, 2024 (appointment of the executive officers for 2024/2026 tenure); February 06, 2025 (annual business plan - 2025); and February 25, 2025 (management compensation proposal - 2025).
3.4.1 - The executive management's compensation should be established by means of a compensation policy approved by the board of directors through a formal and transparent process that takes into consideration the costs and risks involved.	Partially	The Board's compensation proposal is prepared based on the criteria and metrics described in Item 8 on the Company's Reference Form (version 1.0, filed on May 30, 2025). The proposal for remuneration of the executive officers is submitted annually to the Board of Directors, both in the context of the annual budget analysis as well as the management global compensation proposal, and, once approved, is submitted for deliberation at the Company's ordinary shareholders' meeting. However, there is no formal policy on the subject.
3.4.2 - The executive management's compensation should be tied to results, with medium and long-term goals clearly and objectively related to creation of long-term economic value for the company.	Yes	As detailed in Item 8.1 of the Company's Reference Form (version 1.0, filed on May 30, 2025), part of the compensation of the Company's executive officers (i.e. variable compensation - bonus - and stock-based compensation) reward the achievement of short-, medium- and long-term goals, and performance based upon individual evaluations.
3.4.3 - The incentive structure should be in line with the risk limits established by the board of directors and should prohibit a single person from controlling the decision making process and its respective inspection. Nobody should decide his or her own compensation.	Yes	As described in detail in Item 8.1 of the Company's Reference Form (version 1.0, filed on May 30, 2025), the compensation structure of the Company is in line with the Company's budget and strategic planning, submitted annually for approval by the Board of Directors, as well as market conditions, and such alignment is periodically reviewed. In addition, the Company follows the conflict of interest rules set forth in Brazilian Corporate Law, CVM regulations and B3 Level 2 Regulations regarding the participation of managers in resolutions that directly address their individual benefit or compensation, providing in its Code of Conduct the rules applicable to members of management bodies that are in conflict.

Recommended Practice	Adopted?	Explanation
<p>4.1.1 - As regards the audit committee: (i) its attributions shall include assisting the board of directors in monitoring and controlling the quality of the financial statements, internal controls, risk management and compliance; (ii) it shall be formed mostly of independent members and be coordinated by an independent member of the board; (iii) at least one of its independent members shall have proven experience in the accounting – corporate field¹, in internal controls, finance, and audit, cumulatively; and (iv) it shall have a dedicated budget for procurement of advisors for accounting, legal or other matters, when the opinion of an external expert is necessary.</p>	No	<p>Since May 2023, the Company has a non-statutory audit committee, formed by the Company's vice-presidencies, which has the role of approving the annual plans of activities to be carried out by the internal audit area, as well as receiving and approving the results obtained from the internal audit processes. Furthermore, the Company's Fiscal Council, installed in the last two annual general meetings, has been playing a role similar to the duties set out in this item 4.1.1 in certain aspects, including and especially with regard to monitoring and quality control of the financial statements and the monitoring the work of the Company's independent auditors.</p> <p>In addition, among the instruments used by the company for the monitoring and control of the quality of financial statements, internal controls, risk management and compliance are: (i) the constant evaluation of the processes and standards of routine information technology systems, through evaluations and tests, and use of an integrated system of enterprise management (Enterprise Resource Planning, or ERP) with policies of control, traceability and approvals with differentiated levels, in addition to management reports that support the visualization of internal processes, (ii) the use of a crisis-management team - formed by members of the administration of the shopping center, the press office and the management of the Company - which will apply the Company's crisis management rules with the aim of minimizing the possible tangible and intangible impacts caused by incidents that might occur in their interiors and may cause damages to the consumers, visitors and the image of our shopping centers, (iii) setting up of strategic committees, (iv) holding periodic meetings of the executive board, setting up of sales committees, and use of monitoring reports, (v) the contracting of insurance policies for each project, one that ensures equity risks and another that ensures general liability risks, and (vi) the contracting of insurance policies for expansion, revitalization, readjustment or construction work.</p>
<p>4.2.1 - The fiscal council should have a dedicated charter describing its structure, operation, work program, its roles and responsibilities, without creating obstacles to the individual performance of its members.</p>	Yes	<p><i>By answering "Yes" to this item, it is not possible to include an explanation in the Report.</i></p>
<p>4.2.2 - The minutes of the meetings of the fiscal council should comply with the same rules of disclosure of minutes applicable to the board of directors.</p>	Yes	<p><i>By answering "Yes" to this item, it is not possible to include an explanation in the Report.</i></p>

Recommended Practice	Adopted?	Explanation
<p>4.3.1 - The company should establish a policy for procurement of extra-audit services from its independent auditors, approved by the board of directors that prevents hiring of extra-audit services that could compromise the independence of the auditors. The company should not hire as independent auditor any party that has provided internal audit services to the company in the previous three years.</p>	Partially	<p>The Company observes CVM Resolution No. 23/21 regarding the contracting out of extra-audit services to its independent auditors and, prior to any such contracting, requires its independent auditors to perform all internal procedures to ensure the independence and objectivity required for the performance of external audit services. In addition, the Company adopts governance practices and/or policies aimed at avoiding conflicts of interest and preserving the independence and objectivity of the independent auditors hired, namely: (i) the auditor should not audit his or her own work, (ii) the auditor should not perform managerial duties on behalf of the client, and (iii) the auditor should not promote the interests of the client. Despite the adoption of the above practices, the Company does not have a policy for hiring extra-auditing services from its independent auditors approved by the Board of Directors.</p>
<p>4.3.2 - The independent audit team should report to the board of directors, through the audit committee, if applicable. The audit committee should monitor the effectiveness of the independent auditors' work, as well as their independence. It should also evaluate and discuss the independent auditors' annual work plan and submit it to review by the board of directors.</p>	Yes	<p><i>By answering "Yes" to this item, it is not possible to include an explanation in the Report.</i></p>
<p>4.4.1 - The company should have an internal audit department tied directly to the board of directors.</p>	Partially	<p>In May 2023, the Company's internal audit area was formally established, with the purpose of promoting best practices in risk management and controls of the corporate processes that support the Company's results. The activities carried out by the internal audit area are free from any unauthorized interference, having freedom, acting with transparency, in accordance with the guidelines and approvals of the CEO and Vice-Presidency of Compliance and Institutional.</p>
<p>4.4.2 - In the event such activity is outsourced, the internal audit services should not be performed by the same company that audits the financial statements. The company should not hire as internal auditor anyone that has provided independent auditing services to the company in the previous three years.</p>	Yes	<p><i>By answering "Yes" to this item, it is not possible to include an explanation in the Report.</i></p>

Recommended Practice	Adopted?	Explanation
<p>4.5.1 - The company should adopt a risk management policy, approved by the board of directors, that includes definition of the risks from which it seeks protection, instruments used for such purpose, organizational structure for risk management, assessment of the suitability of the operating structure and internal controls in verifying the effectiveness thereof, as well definition of guidelines for establishment of the acceptable limits for exposure of the company to such risks.</p>	Partially	<p>The Company adopts a set of manuals, rules and procedures designed to mitigate or control risks related to its various operating processes, although it does not have a specific policy approved by the Board of Directors. The Company adopts permanent risk management process structured based on the mapping of the main risks associated with the Company's strategies and processes, aiming at prioritizing strategic and operational risks to be addressed and monitored. For information on the Company's current risk management model, including its objectives and strategies and the organizational structure for risk management, see Item 5.1 of the Company Reference Form (version 1.0, filed on May 30, 2025).</p>
<p>4.5.2 - The board of directors is responsible for ensuring that the executive management has mechanisms and internal controls to acknowledge, assess and control the risks, in order to keep them at levels compatible with the established limits, including an integrity/compliance program that seeks compliance with laws, regulations, internal and external standards.</p>	Yes	<p>The Company's integrity/compliance program is the result of a series of measures adopted to comply with and disseminate standards of ethical, anti-corruption and socio-environmental conduct, among which we highlight: (i) adoption of a Code of Conduct, approved by the Board of Directors, applicable to its employees, suppliers and business partners, as updated in 2014, to reflect the provisions of Law 12.846/13 (Anti-Corruption Law) and in 2022, to discipline news topics, (ii) adoption of a standard compliance clause in all contracts entered into by the Multiplan Group's companies with suppliers and service providers, (iii) creation of the Financial Committee and approval of the Regulation for Approval of Relevant Payments, (iv) conducting various training sessions focused on the Anti-Corruption Law, in several locations where the Company has establishments, with the participation of executive officers, managers, employees and service providers, and (v) communicating to our suppliers the reaffirmation of our commitment to the anti-corruption and socio-environmental rules. The Compliance Program is coordinated by the Company's Compliance area with the support of the Institutional Legal Department, with supervision by the Institutional and Compliance Vice-Presidency and reporting to the Presidency</p>
<p>4.5.3 - The executive management should assess, at least once per year, the effectiveness of the risk management policies and systems, as well as of the integrity/compliance program, and report such assessment to the board of directors.</p>	Yes	<p>The Company clarifies that its principal executives, including statutory officers, meet periodically to discuss the Company's risk management practices, internal controls and integrity/compliance program. The Company has a Compliance area since 2015, which since 2018 has been carried out by its own Vice-Presidency (Vice-President of Compliance and Institutional), ensuring decision-making autonomy and adequate resources for the implementation of integrity procedures. Integrity matters are periodically reported to the Board of Directors and the Chief Executive Officer.</p>

Recommended Practice	Adopted?	Explanation
<p>5.1.1 - The company should have a conduct committee, with independence and autonomy and tied directly to the board of directors, in charge of implementing, disseminating, training, revision, and updating of the conduct of conduct and reporting channel, as well as conducting investigations and proposing corrective measures related to breaches of the code of conduct.</p>	Partially	<p>The Company has an ethics committee designed and organized under the under the terms of the Company's new Code of Conduct, which was approved by the Board of Directors on August 22, 2022. The Company's ethics committee is responsible, among other things, for (i) promoting and monitor compliance with the guidelines set forth in the Code of Conduct, (ii) establishing criteria for dealing with situations not foreseen in the Code, deciding on controversial situations, resolving ethical dilemmas and ensuring the uniformity of the criteria used in the settling of similar cases; (iii) review and update the Code, whenever necessary, upon approval by the Board of Directors; and (iv) supervise the verification of violations of ethical and conduct norms, acting to promote, in a timely manner, the necessary investigations and measures; and (v) recommend applicable disciplinary measures in the event of non-compliance with the Code of Conduct. The Code of Conduct provides that the Ethics Committee must work in collaboration with the Presidency and the Institutional and Company Vice-Presidency, so the Company considers that it partially meets this item, notably regarding the requirement that the Committee be directly linked to the board of directors.</p>
<p>5.1.2 - The code of conduct, prepared by the executive management with the conduct committee's support and approved by the board of directors, should: (i) discipline the company's internal and external relationships, expressing the expected commitment of the company, its directors, officers, shareholders, collaborators, suppliers and stakeholders to adopting suitable standards of conduct; (ii) manage conflicts of interest and provide for abstention of any member of the board of directors, audit committee and/or conduct committee, if applicable, that, as the case may be, is conflicted; (iii) clearly define the scope and range of the actions that seek to ascertain the occurrence of events understood as having been carried out with use of privileged information (e.g.: use of privileged information for business purposes of to obtain advantages in trading of securities; (iv) establish that the ethical principles should underlie any negotiation of agreements, contracts, proposals for amendment of the bylaws, as well as the policies that guide the company as a whole, and establish</p>	Yes	<p><i>By answering "Yes" to this item, it is not possible to include an explanation in the Report.</i></p>

Recommended Practice	Adopted?	Explanation
a maximum value of third party goods and services that the company's management and collaborators can accept free of cost or in a privileged manner.		
5.1.3 - The reporting channel should be independent, autonomous and impartial, operating under guidelines defined by the executive management and approved by the board of directors. It should be operated independently and impartially and should ensure the anonymity of its users, as well as timely promote the necessary investigations and measures. This service can be outsourced to a third party with known ability.	Yes	The Company clarifies that since 2023 it provides an Ethics Channel (multiplan.com.br/canaldeetica), managed by an independent third-party company through which any interested party can report suggestions, complaints or denunciations. The confidentiality of all messages received, which can be sent anonymously or identified, is ensured. Contacts are treated impartially, confidentially, and anonymously by a specialized team under Compliance coordination, with the guarantee of confidentiality and non-retaliation.
5.2.1 - The company's corporate governance rules should ensure separation and clear definition of the duties, roles, and responsibilities related to the mandate of all governance agents. The decision-making limits for each instance should also be established, with the purpose of minimizing possible conflicts of interest.	Yes	The functions, roles and responsibilities of the governance agents are clear and well defined, as an example of which is the segregation of duties of the members of the statutory executive board, as approved at the Meeting of the Board of Directors held on May 03, 2024, which reflects in other hierarchical levels under the management of the respective boards.

Recommended Practice	Adopted?	Explanation
<p>5.2.2 - The company's corporate governance rules should be made public and determine that the person that is not independent in relation to the matter under discussion or deliberation in the company's management or supervisory bodies should state, in a timely manner, its conflict of interest or private interest. If such person fails to do so, the rules should provide that another person state the existence of conflict, if it has knowledge thereof, and that immediately upon verification of the conflict of interest in relation to a specific matter, the person involved should withdraw, including physically, from any discussions and resolutions. The rules should provide that this temporary withdrawal must be recorded in the relevant minutes.</p>	<p>Yes</p>	<p>Chapter 4 of the Company's Code of Conduct deals with conflict of interests and establishes rules in this regard. For additional information on the Company's conflicts of interest practices, see item 7.1 (c) of the Company's Reference Form (version 1.0, filed on My 30, 2025).</p>
<p>5.2.3 - The company should have mechanisms for management of conflicts of interest in matters submitted to approval of the shareholders' meeting, to receive and process allegations of conflict of interest, and to invalidate votes cast in conflict, even if subsequently to the relevant meeting.</p>	<p>Yes</p>	<p>For information on the Company's conflicts of interest practices, see items 7.1 (c) of the Company's Reference Form (version 1.0, filed on May 30, 2025).</p>
<p>5.3.1 - The bylaws should define which related-party transactions should be approved by the board of directors, with the exclusion of any members with potentially conflicting interests.</p>	<p>Yes</p>	<p><i>By answering "Yes" to this item, it is not possible to include an explanation in the Report.</i></p>

Recommended Practice	Adopted?	Explanation
<p>5.3.2 - The board of directors should approve and implement a related-party transactions policy that includes, among other rules: (i) provision that prior to approval of specific transactions or guidelines for procurement of transactions, the board of directors should request to the executive management market alternatives to the relevant transaction with related parties, adjusted pursuant to the risk factors involved; (ii) provision that there shall be no forms of compensation to advisors, consultants or intermediaries that give rise to conflicts of interest with the company, management, the shareholders or any class of shareholders; (iii) provision that loans in favor of the controlling shareholder or members of management shall be prohibited; (iv) the forms of transactions with related parties that should be supported by independent appraisal reports, prepared without participation of any of the parties involved in the relevant transaction, whether banks, attorneys, specialized consulting companies, among others, based on realistic assumptions and information endorsed by third parties; (v) provision that corporate reorganization involving related parties should ensure equal treatment of all shareholders.</p>	<p>Yes</p>	<p>The Article 22 (o) of the Company's Bylaws establishes that any transactions involving related parties must be submitted to the approval of the Company's Board of Directors, in compliance with Law No. 6.404/76, which prohibits the intervention of members of the Board of Directors (and executive officers) in any social operation in which they have an interest conflicting with those of the Company, or in the deliberations that the other directors may take in respect thereof. The Company follows the rules regarding related party transactions, as set forth in Law No. 6,404/76, in CVM rules and B3 Governance Level 2 Regulations.</p> <p>Therefore, in the case of the Company, the related party transactions policy is set forth in the Company's Bylaws.</p>

Recommended Practice	Adopted?	Explanation
5.4.1 - The company should adopt, upon resolution of the board of directors, a securities trading policy that, without prejudice to compliance with rules to be established by CVM regulation, establishes controls that enable monitoring of negotiations performed, as well as verification and punishment of the persons responsible in the event of breach of the policy.	Yes	The company adopted a securities trading policy, approved by the Executive Board on March 29, 2007 and later upgraded on August 12, 2008 and November 10, 2016, and believes that such a policy sets out appropriate controls for monitoring the negotiations, as well as for investigation and punishment of those responsible, since it provides for: (i) the need for communication on trading of the Company's shares by managers, controlling shareholders and the Company itself, (ii) rules on adoption of individual investment Plans, (iii) the incentive to report suspected violation of the policy to the Investor Relations Officer and (iii) the investigation and analysis of possible infractions are the responsibility of the executive board and the application of sanctions rests with the Board of Directors. Since 2021, the Company has offered a course on its e-learning platform that addresses the Securities Trading Policy and the Material Fact or Act Disclosure Policy.
5.5.1 - In an effort to ensure greater transparency regarding use of company funds, a policy on its voluntary contributions should be prepared, including those related to political activities, to be approved by the board of directors and implemented by the executive management, containing clear and objective principles and rules.	Yes	The policy on voluntary contributions is set out in Chapter 6 of the Company's Code of Conduct, as approved by the Board of Directors on August 22, 2022, which is entirely available for consultation through the Empresas.NET System, accessible on the CVM page at world wide web, and on the Company's investor relations website (http://ri.multiplan.com.br/).
5.5.2 - The policy should provide that the board of directors is the corporate body responsible for approving all disbursements related to political activities.	Partially	<i>The Company's Code of Conduct, approved by the Board of Directors on August 22, 2022, prohibits the use of Multiplan's resources or name to make donations and/or financing to political campaigns, candidates, or political parties, in violation of the law.</i> <i>In any case, current electoral legislation prohibits any donations by legal entities to candidates or political parties.</i>
5.5.3 - The policy on voluntary contributions of state-owned enterprises, or of companies that have relevant and reiterated business relationships with the State, should prohibit contributions or donations to political parties or persons related thereto, even if they are permitted by law.	Not applicable	Not applicable.