

JHSF

BUSINESS UNIT	
JHSF (HOLDING)	Material Fact or Fact Disclosure Policy of the Company
CODE	
POL.JUR.HOLD.001	VERSION No. V3.0

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MATERIAL FACT OR FACT DISCLOSURE POLICY OF JHSF PARTICIPAÇÕES S.A.
(APPROVED AT THE BOARD OF DIRECTORS' MEETING DATED AS OF 02/02/2007, AMENDED ON
03/25/2014 AND ON 12/17/2021)

1. Purpose

The general principle of this Material Fact or Fact Disclosure Policy ("Policy") is to establish the duty of JHSF Participações S.A. ("JHSF" or "Company") to adequately disclose material information about its business, establishing the obligations and mechanisms for disclosing this information to the market.

2. Target Audience

The rules of this Policy apply to Bound Persons as defined in this Policy.

3. Reference Documents

- a) Law 6,404/76 (Brazilian Corporations Law);
- b) B3's Novo Mercado Regulation;
- c) CVM Resolution No. 44/2021; and
- d) Company's Bylaws.

4. Definitions

Material Act or Fact: any decision by the controlling shareholder, resolution by the general meeting or the Company's management bodies, or any other act or fact of a political-administrative, technical, business or economic-financial nature related to the Company's business, which may significantly influence:

- a) the quotation of Securities issued by the Company or related to them;
- b) the decision of investors to buy, sell or hold Securities issued by the Company;
- c) the decision of investors to exercise any rights inherent to the condition of holder of Securities issued by the Company.

Stock Exchanges: B3 S.A. – Brasil, Bolsa, Balcão ("B3"), as well as any other stock exchanges or organized over-the-counter markets where the Company has securities admitted for trading.

Company or JHSF: means JHSF Participações S.A.;

Conglomerate: JHSF and all of its subsidiaries, controlled companies and affiliates;

CVM: Brazilian Securities and Exchange Commission;

Chief Investor Relations Officer: the Officer of the Company elected to exercise the duties set forth in the CVM's instructions and regulations, including the execution, follow-up and inspection of compliance with this Policy;

Insider Information: information concerning the Material Act or Fact until it is disclosed to the CVM, the Stock Exchange and other similar entities and, simultaneously, to the shareholders and investors in general. It is considered as Insider Information, in addition to other events: (a) that related to the quarterly or annual financial information not yet disclosed to the market; (b) studies, analysis or accomplishment of merger transactions, total or partial spin-off, consolidation, conversion, or any form of corporate reorganization or business combination, change in the control of the company, including by means of execution, amendment or termination of shareholders' agreement, decision to promote the cancellation of the registration of the publicly-held company or change in the environment or trading segment of the shares issued by it; and (c) studies, analyses or period prior to the request for judicial or extrajudicial reorganization and bankruptcy made by the Company itself;

Related Person(s): persons with the following links to the Bound Persons: (i) the spouse, from whom they are not judicially or extrajudicially separated, (ii) the partner; (iii) any dependent included in the

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individual's annual income tax return; (iv) descendants and collateral up to the direct or indirect third degree; and (v) the companies directly or indirectly controlled by the Bound Persons or their respective Related Persons;

Bound Person(s): the Company, the direct or indirect controlling shareholders, members of the Board of Directors, members of the Supervisory Board, members of the Statutory and Non-Statutory Board, members of the Statutory Audit Committee and of any bodies with technical or advisory functions, created or not by statutory provision, or whoever, by virtue of their position or function in the Company, or in the JHSF Conglomerate, has knowledge of the information related to the Material Act or Fact;

Policy: this Material Act or Fact Disclosure Policy of the Company;

CVM Resolution No. 44/2021: resolution issued by the CVM that provides for the information disclosure on a material act or material, the securities trading pending an undisclosed material act or fact, and the information disclosure on securities trading;

Acceptance Agreement: the formal instrument, which shall be signed by the Bound Persons and filed at JHSF's head office, the model of which is attached to this Policy, by means of which the Bound Persons accept the rules contained in this Policy, assuming the obligation to comply with them and to ensure that they are complied with by people under their influence, including controlled companies, affiliates or companies under common control, spouses and direct or indirect dependents;

Securities: any shares, debentures, real estate receivables certificates, subscription warrants, receipts and subscription rights, promissory notes, call or put options or derivatives of any kind, or, further, any other securities or collective investment agreements issued by the Company or referenced to them that, by legal determination, are considered "securities", existing on the approval date of the Disclosure Policy or that may be subsequently created.

5. Acceptance Agreement

All the Bound Persons, and those who will acquire this description, shall formalize their acceptance to the Policy, by signing the Acceptance Agreement, pursuant to the model contained in Annex I, which shall be filed at the head office of JHSF. JHSF shall keep at its head office, for as long as the Bound Person maintains the link, and for at least five (5) years after their dismissal, the updated list of the persons who signed the Acceptance Agreement, with their respective descriptions, position or function, address and enrollment number with the Corporate Taxpayers' Register (CNPJ) or Individual Taxpayers' Register (CPF). The list will always be kept at the disposal of CVM, under the law in force.

6. Disclosure

The Chief Investor Relations Officer is responsible for disclosing and communicating to the CVM and the Stock Exchange any Material Act or Fact occurred or related to the Company's business, as well as ensuring its broad and immediate dissemination, ensuring that the disclosure to the CVM and the Stock Exchange of the Material Act or Fact precedes or is made simultaneously with the dissemination of information by any other means of communication.

In addition to the examples of potential Material Act or Fact listed in the sole paragraph of article 2 of CVM Resolution No. 44/2021, the Chief Investor Relations Officer is responsible for evaluating the specific case of a particular event to configure Material Act or Fact, considering its materiality and strategic importance to the Company.

The disclosure of Material Act or Fact will be made through the news website (www.portalneo1.net), in addition to the Company's investor relations page on the Internet at <https://ri.jhsf.com.br/>, in identical content to that sent to the CVM and the Stock Exchange.

The Bound Persons shall communicate to the Chief Investor Relations Officer any Material Act or Fact of which they may become aware.

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The Bound Persons who find omission by the Chief Investor Relations Officer in the disclosure of any Material Act or Fact will only be exempt from their personal responsibilities if they immediately communicate the Material Act or Fact to the CVM, except in the case of item 7 below.

7. Exception to Immediate Disclosure

The Material Acts or Facts may, exceptionally, not be disclosed if the Company's controlling shareholders or directors understand that their disclosure will put legitimate interest of the Company at risk.

Should the information on the Material Act or Fact referred to in the previous item get out of control, or if there is an atypical fluctuation in the quotation, price or number of the Securities traded, the Chief Investor Relations Officer shall immediately promote the disclosure of the Material Act or Fact.

8. Obligation of Confidentiality

The Bound Persons must maintain absolute confidentiality about any Confidential Information that has not yet been disclosed, to which they have access due to their office or position, until such Confidential Information is disclosed to the public, and ensure that their Related Persons and subordinates also do the same, being held jointly and severally liable with them in the event of non-compliance.

The Bound Persons must not discuss Insider Information in public places. Likewise, the Bound Persons should only discuss matters related to Confidential Information with those who have a need to know such information.

It is prohibited for Bound Persons to use such information for their own benefit or that of third parties.

9. Quiet Period

Aiming at greater equity in the transmission to investors and other market participants of the financial information (quarterly and annual), the Company will adopt a quiet period of at least fifteen (15) days prior to the public disclosure of this information, with the Bound Persons being unable to provide statements on the results of the period in reference.

In order to determine the quiet period, the period of fifteen (15) calendar days is counted excluding the disclosure day.

10. Miscellaneous

Pursuant to Paragraph 3 of Article 18 of CVM Resolution No. 44/2021, it is incumbent on the Company's Chief Investor Relations Officer to execute and monitor the Policy execution and management; and to resolve and clarify any doubts related to its enforcement, as well as on the interpretation of applicable rules.

The Policy was prepared in compliance with CVM Resolution No. 44/21, but does not replace it. The Bound Persons must observe all the rules set forth therein, as well as any subsequent amendments thereto.

Any breaches of the Policy must be reported immediately to the Chief Investor Relations Officer, so that he may take the appropriate actions.

11. Policy Amendment

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This Policy has been approved by JHSF's Board of Directors and any amendment or review shall be submitted to such body for approval.

12. Term

This Policy will take effect on the date of its approval by the Board of Directors and will be in force for an indefinite period, until there is a resolution to the contrary.

13. Company Sanctions for Non-Compliance with this Policy

Non-compliance with this Policy subjects offenders to the disciplinary sanctions applicable according to the Company's internal rules.

14. Review History

Review	Date	Reason	Responsible
V3.0	12.17.2021	Review to reflect CVM Resolution No. 44/2021	Legal Department
V2.0	03/25/2014	Review to reflect CVM Instruction No. 547/2014	Legal Department
V1.0	02/02/2007	Initial Version	Legal Department

15. Validation

Description	Name Position
PREPARATION	Giovanna Araujo Pacheco – <i>Legal Area</i>
REVIEW	Julianne Godoy Barra - <i>Internal Controls and Risk Management</i>
	João Alves Meira Neto - <i>Legal Board</i>
	Mara Boaventura Dias – <i>Investor Relations Office</i>
APPROVAL	Board of Directors



ANNEX I - ACCEPTANCE AGREEMENT

By this instrument, I, [full name], [nationality], [marital status], [job], bearer of identity card [RG] No. [--], issued by [--], enrolled with CPF/MF under No. [--], resident and domiciled in the city of [--], at [full address], I declare my acceptance to the Information Disclosure and Securities Trading Policies (“Policies”) of JHSF Participações S.A., approved by the Board of Directors, in compliance with CVM Resolution No. 44/2021.

I also declare that I have received the content of the Policies, for which reason I am fully aware of the duties and responsibilities inherent to them.

Place, _____, 2 ____.

[signature]