

Disclosure of Information and Securities Trading Policy



8th revision and consolidation

November/2023

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1. Purpose

This Policy aims to regulate the use and disclosure of Material Information within the scope of the Company and its subsidiaries and provide guidelines on the rules for trading securities issued by the Company and its Controlling Company, including derivatives referenced to said securities.

2. Application and Coverage

This Policy applies to the following:

- (a) the Company;
- (b) the Controlling Shareholders, direct and indirect;
- (c) the Members of the Company's Board of Directors:
- (d) the Members of the Company's Executive Board, statutory and non-statutory, the latter also defined as Employees;
- (d) the Members of the Company's Audit Board, when installed;
- (e) the members of any of the Company's technical or advisory bodies established by statutory provision; and
- (f) other parties which the Company, at its sole discretion, considers relevant for the purposes of this Policy and who have committed, in writing, the duty to comply with it, including third parties hired by the Company with permanent or occasional access to Material Information, or any party who may have knowledge of Material Information due to a commercial, professional, or trust relationship with the Company or due to his/her position, function or role at the Company, its Parent Company or Subsidiaries.

3. References

- Federal Law 6.385, of December 7, 1976, which regulates the securities market and establishes the Securities and Exchange Commission;
- Federal Law 6.404, of December 15, 1976, the Brazilian Corporate Law;
- CVM Resolution 44, of August 23, 2021, which regulates the disclosure of information for a Material Act or Fact, the trading of securities when a Material Act or Fact has not been disclosed, and the disclosure of information on trading of securities;
- CVM Resolution 80, of March 29, 2022, which regulates the registration and provision of periodic and occasional information on issuers of securities admitted to trading on regulated securities markets;
- Brazilian Code of Corporate Governance for Publicly Held Companies published by the Brazilian Institute of Corporate Governance ("IBGC");
- Regulation of Level 1 of Corporate Governance of B3 S.A. – Brasil, Bolsa, Balcão;
- the Company's Bylaws; and
- the Company's Code of Ethics and Conduct.

4. Definitions

Controlling Shareholders or Parent Company: a shareholder or group of shareholders that exercise the power of control over the Company, pursuant to Law 6,404/76.

Administrators: members of the Company's Board of Directors and Executive Board, elected at the General Shareholders' Meeting or by the Board of Directors, acting on their own behalf or on behalf of the Company.

Investor Relations or IR Department: the Company's department that works to support the Investor Relations Officer in complying with this Policy.

Material Act or Fact: any decision made by the controlling shareholder, resolutions made by a shareholders' meeting or the Company's management bodies, or any other act or fact of political, administrative, technical, business, or financial nature that occurred or is related to the Company's business and that could significantly affect: (a) the price of Company securities or references to them; (b) the decision of investors to buy, sell or hold said securities; and (c) the decision of investors to exercise any rights inherent in the ownership of securities issued by the Company or referenced to them. Examples of potential material acts or facts can be consulted in Article 2, sole paragraph, of CVM Resolution 44.

Stock Exchange: the stock exchanges on which the Company's securities are admitted for trading.

Employees: non-statutory directors and other employees of the Company, its Parent Company, or its Subsidiaries.

Company: Fras-le S.A.

Notice to the Market: the instrument by which the Company discloses any information that is not conceptually classified as a Material Fact, pursuant to CVM Resolution 44, but that the Investor Relations Officer deems important for investors and market participants to gain awareness, even if its disclosure is not required by the legislation and regulations in force.

Audit Councilors: members of the Company's audit board, and their alternates, in the years in which the audit board has been installed by the general shareholders' meeting.

Accredited Broker: the securities broker accredited by the Company for trading in its securities by Covered Persons.

CVM: the Brazilian Securities and Exchange Commission.

Investor Relations Officer or IRO: the director at the Company responsible for providing information to investors, the CVM, and the Stock Exchange, as well as for maintaining the Company's registration updated with the CVM.

Former Administrators: members of the Company's Board of Directors and Executive Board that are no longer part of the Company's management.

Material Information: any information related to the Company, its Parent Company, or any of its subsidiaries that has not yet been disclosed to investors and that may significantly affect the price of its securities.

Insider Trading: the trading of securities based on knowledge of material information that has not yet been made public, aimed at obtaining a profit or personal advantage in the market, or to benefit a third party.

Technical or Advisory Bodies: the Company's bodies, established by statutory provision, with technical functions or to advise its administrators.

Black-out Period: periods in which Covered Persons are prohibited from trading securities issued by the Company and its Parent Company.

Covered Persons: controlling shareholders, administrators, audit councilors, members of any bodies with technical or advisory functions established by statutory provision, as well as any other party who, by virtue of his/her position, function or role at the Company, its Subsidiaries or Affiliates, or at the Parent Company, are aware of Material Information, as already defined in this Policy.

Related Persons: individuals with the following relationships with Persons Covered: (i) a spouse from whom they are not judicially or extrajudicially separated; (ii) a companion/partner; (iii) any financial dependent included in their annual income tax declaration; and, (iv) companies controlled, directly or indirectly, by the Covered Persons or by the persons mentioned in items "i", "ii" and "iii" above.

Individual Investment or Divestment Plan or Individual Plan: a specific trading policy, provided in Article 16 of CVM Resolution 44, by which the Covered Persons establish their long-term commitment to purchase, with their own funds, or sell securities issued by the Company.

Power of Control or Control: the power to direct activities and guide the functioning of the Company's bodies, directly or indirectly, de facto or de jure. There is a relative presumption of control for the shareholder or group of shareholders who hold shares that guarantee, on a permanent basis, directly or indirectly, the majority of votes in deliberations at shareholders' meetings and the power to elect the majority of the Company's administrators.

CVM Resolution 44: CVM Resolution, of August 23, 2021, that revoked CVM Instruction 358, of January 3, 2002; CVM Instruction 369, of June 11, 2002; and CVM Instruction 449, of March 15, 2007, and which regulates the disclosure of information for a Material Act or Fact, the trading of securities when a Material Act or Fact has not been disclosed, and the disclosure of information on trading of securities.

Affiliated Companies: companies in which the Company exercises significant influence over management, without controlling them.

Controlled or Subsidiary Companies: companies that are controlled by the Company, directly or indirectly.

Third Parties: individuals or entities who have a commercial, professional, or trust relationship with the Company, such as independent auditors, lawyers, securities analysts, consultants, and institutions that are part of the distribution system, who are responsible for verifying the disclosure of Material Information before trading securities issued by the Company or referenced to them.

Statement of Adhesion: a formal instrument, provided in Article 17, paragraph 1, of CVM Instruction 44, to be signed by the Covered Persons, through which they certify awareness of the rules of this Policy, taking on the obligation to comply with them and to ensure said rules are followed by individuals under their influence.

Securities: shares, debentures, subscription warrants/bonus, certificates of real estate receivables, promissory notes, call or put options, derivatives of any kind, or any other securities or collective investment agreements issued by the Company that are legally considered as securities.

5. Guidelines

5.1. All Covered Persons must act in accordance with the values of good faith, loyalty, and truthfulness, as well as the principles established in this Policy and the Company's Code of Ethical Conduct.

5.2. The relationship between the Company and participants/opinion makers in the Securities market must occur in a uniform, transparent and equitable manner.

5.3. Covered Persons must ensure the Company's disclosure of information is carried out in a correct, complete, and timely manner by the members of management responsible for this duty, according to this Policy and applicable regulations.

5.4. The responsibility of the Covered Persons shall extend to acts carried out by Third Parties, whenever they are under their influence, guidance, or delegation. Notwithstanding, the content of this Policy does not exempt the liability of third parties not directly linked to the Company, but who are aware of Material Information and may trade Securities when a Material Act or Fact has not been disclosed.

6. Purpose of Disclosing Material Information

The purpose of disclosing a Material Act or Fact is to ensure that investors receive, in a timely, efficient and reasonable manner, the information necessary for their investment decisions, promoting the best possible symmetry in the dissemination of information. This is aimed at preventing the misuse of Material Information in the securities market by individuals who have access to said information, for their own benefit or to benefit third parties.

7. Rules for Disclosing Material Information

7.1. The IRO is responsible for analyzing the relevance of information that may substantiate Material Acts or Facts, within the context of regular activities and the size of the Company's business, disclosing, if deemed appropriate, the information to the market in a clear and precise manner and ensuring its broad and simultaneous dissemination.

7.2. If the Covered Persons believe they have information that could substantiate a Material Act or Fact not yet disclosed to the market, they must report it to the IRO, who will be responsible for deciding on its characterization. The IRO may consult the members of the Board of Directors to clarify any questions.

7.3. If the decision to maintain confidentiality is not permitted by law, and if the IRO omits the information, the Covered Persons will only be exempt from liability if they immediately communicate the Material Act or Fact to the CVM.

7.4. Meetings with trade associations, investors, analysts, or with selected audiences, in Brazil or abroad, concerning a matter that may constitute Material Information, must be attended by the IRO or another person indicated for this purpose. Otherwise, the content of said meetings must be reported to the IRO, aiming for a simultaneous disclosure to the securities market.

8. Forms and Deadlines for Disclosing Material Information

8.1. The disclosure of a Material Act or Fact must:

- (a)** be preferably done prior to the start or after the end of the trading session on the Stock Exchange, thus avoiding delays in trading if disclosure is required to be done prior to the start of trading;
- (b)** be communicated simultaneously to the CVM and the market, through a specific system, describing the acts and/or facts that occurred;
- (c)** be made available on the Company's Investor Relations website; and
- (d)** be made available on at least 1 (one) news portal on the Internet, duly identified in the Company's Registration Form, in which the information is available in its entirety in a section that can be accessed free of charge.

8.2. The disclosure must be made during trading hours and the IRO may simultaneously request the securities issued by the Company to be suspended from trading for the time necessary for the adequate dissemination of the Material Information.

9. Exception to Immediate Disclosure

Material acts or facts may be exempt from disclosure, exceptionally, if the controlling shareholders or management understand that said disclosure will put the Company's legitimate interests at risk. In this case, the IRO will be responsible for monitoring the price and trading volume of the securities issued by the Company.

10. Confidentiality and Trading Restrictions

Covered Persons with access to Material Information that has not yet been disclosed are obliged to:

- (a) maintain confidentiality until it is disclosed to the market;
- (b) ensure that subordinates and trusted third parties also maintain confidentiality, responding jointly with them in the event of non-compliance with the duty of confidentiality; and
- (a) respect the prohibition for trading securities issued by the Company under the terms of this Policy.

11. Information on the Acquisition or Disposal of Relevant Equity Interest

11.1. Controlling shareholders, direct or indirect, and shareholders who elected members of the Board of Directors or Audit Board, as well as any natural or legal person or group of persons, acting jointly or representing the same equity interest, who carry out material trading, must forward to the IRO all the information required by CVM Resolution 44, immediately after reaching the equity interests indicated below.

11.2. Material trading consists of those in which the direct or indirect equity interest of these individuals increases or reduces by 5% (five percent), or multiples of this percentage, of the same type of shares that represent the Company's share capital.

11.3. The IRO must, in addition to maintaining on file the proof of messages sent and received regarding the trading transactions, forward the information on the acquisition or sale of relevant equity interests to the CVM and the Stock Exchange, through a specific system, as soon as said information has been received.

11.4. If the acquisition of equity interests has been carried out aimed at changing the composition of control or the administrative structure of the Company, or if the acquisition generates the obligation to carry out a public tender offering, pursuant to applicable regulation, the IRO must also disclose this information, in accordance with this Policy.

12. Disclosure of Information in Public Offerings

12.1. Immediately following the decision to carry out a public tender offering that needs to be registered with the CVM, the offeror must forward to the IRO information such as the number of securities to be acquired or sold, the offer price, payment conditions, and all other conditions for the offering so it can be disclosed to the market, with the exception of procedures that require confidential analysis, according to current regulations.

12.2. The primary or secondary public distribution of securities must only be disclosed when the criteria set out in items I to II of Article 2 of CVM Resolution 44 have been met.

Disclosure of Information on Trading by Management and Linked Persons

13.1. The members of the Company's management, audit board, and technical or advisory bodies established by statutory provision must declare to the IRO their ownership and trading of securities issued by the Company and its Parent Company who are publicly listed companies, as well as trading with derivatives or other securities referenced to the ones issued by the Company and its subsidiaries.

13.2. When they are natural persons, the parties mentioned in the item above must also indicate the securities owned by Related Persons.

13.3. This declaration must contain the information listed in the example form attached to this Policy, identified as Exhibit III, and the respective brokerage statements may also be sent, on the first business day after taking office and within 5 (five) days after the completion of each trading transaction.

13.4. The IRO is responsible for submitting the declaration to the CVM and the Stock Exchange, within 10 (ten) days after the end of the month in which changes to equity interests occurred, and/or the month in which the members of management, audit board or advisory bodies took office, and/or the month in which the information was received.

13.5. The declaration mentioned in this item must include the ownership of shares and must also detail the portion of shares held by the declaring party that has been acquired or sold through the borrowing of shares.

14. Disclosure of Guidance

The Company may occasionally disclose guidance relating to the behavior of the markets in which it operates or guidance for its own future performance, so long as this information is always accompanied by a statement that reflects, even if in other words, the following content: This presentation contains forward-looking information.

Such information does not constitute historical facts but rather reflects the goals and expectations of the Company's management. The words "believes", "may", "will", "continues", "expects", "anticipates", "intends", "plans", "estimates" or similar expressions, written and/or spoken, are intended to identify statements which necessarily involve known and unknown risks. Forward-looking statements and information are not guarantees of performance as they involve risks, uncertainties and assumptions for future events and, therefore, rely on circumstances that may or may not occur.

Future results and the creation of shareholder value may differ materially from those expressed or implied by the forward-looking statements. The factors that may determine these results and figures are beyond the Company's control or its ability to make predictions. The Company does not undertake any obligation to update or revise any forward-looking statements as a result of new information and/or future events. Therefore, under no circumstances is the Company responsible for any investment decision based on the information presented.

15. Comments on Rumors

It is the Company's policy not to comment on rumors, thus responding to questions only with the statement: "It is our policy not to comment on rumors or speculation". If, however, rumors are affecting the price or trading volume of securities issued by the Company, there may be a need for a statement denying or confirming the news. This matter must be evaluated by the IRO and, if applicable, decided by the Board of Directors.

16. Leakage of Information

16.1. The undue disclosure of internal, confidential, and material information to the press and third parties, in disagreement with this Policy, puts the Company's strategic interests at risk as it can lead to asymmetry of information in the market and, consequently, non-compliance with legislation and standards applicable to the Company, including CVM Resolution 44.

16.2. Covered Persons must be aware that the Company has adequate channels and procedures to interact with the press, shareholders, market analysts, and other stakeholders, and the IRO is responsible for deciding on how to proceed with the disclosure of information that may characterize a Material Act or Fact.

16.3. Given the relevance of the matter, the Company adopts internal procedures aimed at maintaining the confidentiality of information, such as: (i) a continuous monitoring of electronic correspondence; and, (ii) the strengthening the Covered Persons' commitment to preserving the confidentiality of information.

17. Insider Trading

17.1. It is prohibited to use Material Information that has not yet been disclosed for the trading of the Company's securities by any party who has knowledge of said information to obtain a personal advantage or to benefit a third party.

17.2. Subject to the exceptions provided in CVM Resolution 44, for the purposes of characterizing the above violation, it is assumed that:

- (a)** any person who has traded securities with knowledge of Material Information made use of said information in the trading activity;
- (b)** Controlling Shareholders, direct or indirect, members of the Executive Board, members of the Board of Directors, members of the Audit Board, and the Company itself, in relation to trading of securities issued by the Company, have access to all Material Information;
- (c)** the persons mentioned in paragraph "b" and those who have a commercial, professional, or trust relationship with the Company, when having access to the Material Information, know that it is privileged information;
- (d)** members of the Executive Board, members of the Board of Directors, and members of the Audit Board that leave the Company and have knowledge of Material Information, for the purposes of trading securities issued by the Company, this information shall be considered valid for a period of 3 (three) months counting from his/her departure, or until the Company discloses said Material Act or Fact to the market, whichever occurs first; and
- (e)** the following information, from the initiation of studies or analysis on the matter, shall be considered Material Information: (i) discussions on mergers, spin-offs, transformations, or any form of corporate reorganization or business combination; (ii) changes in the Company's ownership control; (iii) decision to cancel the Company's registration as a publicly-held company or a change in the trading segment of the Stock Exchange in which its shares are traded; and (iv) requests for judicial or out-of-court reorganizations or bankruptcy made by the Company.

18. Prohibition for Trading Securities

18.1. The Company and Covered Persons may not carry out any type of trading activities with securities issued by the Company and its Parent Company, in the following situations:

- (a)** in the period of 15 (fifteen) days preceding to the disclosure date of the Company's quarterly accounting information and annual financial statements. This prohibition is regardless of awareness of the content of said information, existence of Material Information pending disclosure, or intention of trading securities. This restriction period shall be counted excluding the actual disclosure date, however, trading activities with securities may only be carried out on said date after the disclosure has effectively occurred; and
- (b)** from the date in which awareness of Material Information occurs until the date in which said information is disclosed to the market;

18.2. When the IRO confirms the existence of undisclosed Material Information, regardless of any justification, he/she may determine a Black-out Period in which Covered Persons will not be able to trade securities issued by the Company and/or its Subsidiaries, in addition to maintaining confidentiality on the matter. Black-out Periods shall be disclosed by the IRO, indicating the starting date and lasting until a new statement informing the end of the Black-out Period is disclosed.

18.3. The prohibition for trading securities provided in item 18.1 shall not apply, as the case may be, to other situations provided in CVM Resolution 44.

19. Exceptions to the Prohibition for Trading Securities

The prohibitions established in this Policy do not apply to Covered Persons in:

- (a) private trading between the same Covered Persons, understood as those carried out outside the Stock Exchange;
- (b) transactions intended to fulfill obligations assumed prior to the beginning of the Black-out Period arising from the borrowing of securities, exercise of purchase or sale options by third parties, and forward purchase and sale contracts;
- (c) trading activities carried out by investment funds or clubs of which the Covered Persons are shareholders, provided they are not exclusive funds or clubs and the decisions taken by the investment fund administrators cannot be influenced by the shareholders; and
- (d) trading activities involving fixed income securities, when carried out through transactions with combined commitments of repurchase by the seller and resale by the buyer for settlement on a pre-established date, prior to or equal to the maturity of the securities involved in the transaction, in which the returns or remuneration parameters are predefined.

20. Individual Investment or Divestment Plan

20.1. Covered Persons, Employees, Related Persons, and any person with a relationship with the Company that makes them potentially subject to the provisions in item 15.2 of this Policy, may implement an Individual Investment or Divestment Plan, in which they must indicate their commitment to purchase or sell securities issued by the Company, with their own resources, being responsible for the information provided therein when elaborating their Individual Plan.

20.2. The Individual Plan must be formalized, in writing, to the IRO and must contain the following terms:

- (a) the first transaction may only be carried out after 3 (three) months after the plan has been presented, and/or modified, and/or cancelled;
- (b) the type of scheduled transactions (purchase or sale);
- (c) the dates or events and the approximate amounts or numbers of trades to be carried out;
- (d) the trading periods, which may not be less than 12 (twelve) months;
- (e) the name of the Accredited Broker that will intermediate the trading activities;
- (f) the names of the Related Persons; and
- (g) in the case of investment, the commitment not to sell the securities acquired under the Individual Plan prior to 3 (three) months from the last purchase date, except for reasons of force majeure.

20.3. In addition to the provisions in item 18.2, the Individual Plan may foresee the trading of securities during the 15 (fifteen) days preceding the disclosure of the quarterly accounting information and the annual financial statements if: (i) the Company has approved a schedule defining specific dates for disclosing accounting and financial information; and (ii) the participant of the Individual Plan commits to reimburse the Company for any avoided losses or gains from the trading of securities foreseen in the Individual Plan arising from any changes in the disclosure dates, calculated based on reasonable criteria defined in the Individual Plan.

20.4. The Individual Plan may not be formalized if the disclosure of Material Information that the interested party is aware of has not yet been disclosed, neither during the 15 (fifteen) days preceding the disclosure of quarterly accounting information and annual financial statements.

20.5. Participants are prohibited from maintaining more than one Individual Plan in force, whether for investment or disinvestment, as well as carrying out transactions that nullify or mitigate the economic effects of the transactions foreseen in their Individual Plan.

20.6. After the Individual Plan expires, a new Plan will be implemented, so long as it continues to comply with the requirements set out in this Policy.

20.7. If the markets in which the Company's shares are listed do not operate on the dates indicated in the Individual Plan (i.e. Saturdays, Sundays, or holidays), transactions must be carried out on the first business day following the initially scheduled date.

20.8. The IRO may refuse to file the Individual Plan with the Company if it does not comply with this Policy or with current legislation and, when requested by the CVM, the IRO must inform the Individual Plans filed with the Company.

20.9. The Board of Directors, or another body delegated by it, must verify, at least every six months, that the trading activities carried out by the participants adhere to the Individual Plans formalized by them.

21. Accredited Broker

21.1. To ensure adequate trading standards with securities issued by the Company and its subsidiaries, all trading activities by Covered Persons, not extending to Related Persons and Third Parties, may only be carried out by an Accredited Broker.

21.2. The Accredited Broker will send a monthly report with the trading activities for the Covered Persons so the Company can verify their adherence and compliance with this Policy and, in case of non-compliance, take the appropriate measures.

21.3. Through the Statement of Adhesion, all Covered Persons will be informed the name of the Accredited Broker, and the Company will be responsible for notifying whenever a replacement has occurred.

21.4. Covered Persons who have open positions for securities issued by the Company must transfer said positions to the Accredited Broker within a period of up to 60 (sixty) days from the date of taking office or the date in which the Statement of Adhesion was signed. Exceptions must be previously approved by the IRO.

22. Responsibilities of the IR Officer

The responsibilities of the IRO include:

- (a)** disclosing and ensure the wide dissemination of any Material Information related to the Company's business, immediately after becoming aware of it;
- (b)** executing and monitoring the terms of this Policy in all communication between the Company, the CVM, and the Stock Exchange, as well as between the Company and other members of the Securities Market;
- (c)** acting as the Company's main spokesperson on matters relating to the Securities Market;
- (d)** promptly responding to the competent authorities regarding any requests for additional clarification, correction, addition or new disclosure of a Material Act or Fact;
- (e)** receiving communications about the amounts, characteristics, and types of purchases of securities issued by the Company, its parent company or subsidiaries that are held by Covered Persons and traded on the securities market, as well as changes in their ownership positions, and transmit said information to the CVM and the Stock Exchange;
- (f)** assessing that Individual Plans have been elaborated in accordance with this Policy and forward to the Board of Directors, or a corporate body delegated by it, the results from the monitoring of the Individual Plans that involve trading securities issued by the Company;
- (g)** communicating, with the support of the IR team, the beginning and ending of Black-out Periods, except for those previously mentioned in this Policy and provided in applicable regulations; and
- (h)** answering any questions related to this Policy.

23. Non-compliance with this Policy

23.1. Failure to comply with this Policy will subject the violator to disciplinary measures, pursuant to the Company's internal rules, including its Code of Ethical Conduct and the Sanctions Policy, as well as constituting a serious infraction for the purposes set out in Article 11, paragraph 3, of Law 6,385/76.

23.2. Furthermore, the use of Material Information that has not yet been disclosed may be classified as a crime, subject to a penalty of years in prison and a fine, pursuant to Article 27-D of Law 6,385/76.

24. Training

Mandatory, periodical training must be carried out to raise awareness and engage Covered Persons in relation to the guidelines contained in this Policy.

25. Final Provisions

25.1. The Board of Directors may, at any time, promote changes to this Policy, which must be promptly communicated by the IRO to the Covered Persons, the CVM, and the Stock Exchange, coming into effect on the date in which the changes were informed to the parties.

25.2. Any violations to the provisions of this Policy must be immediately reported to the Company's IRO.

25.3. Covered Persons who fails to comply with any of the provision contained in this Policy are obliged to reimburse the Company for all losses that it may incur arising from said non-compliance.

25.4. A Covered Person will be automatically removed from the obligations of this Policy in the following situations:

- (a)** resignation or dismissal from the position of member of the Executive Board, member of the Board of Directors, and member of the Audit Board, as well as from any technical or advisory body established by statutory provision;
- (b)** termination of an employment contract, for employees; and
- (c)** death of the individual or extinction of the legal entity.

26. Control of Information and Parties Responsible of its Elaboration

Version	Date	Effectiveness
1st Version	06/17/2002	06/17/2002
2nd Version	10/21/2009	10/21/2009
3rd Version	04/28/2014	04/28/2014
4rt Version	04/11/2015	04/11/2015
5th Version	12/05/2016	12/05/2016
6th Version	06/28/2019	06/28/2019
7th Version	11/09/2021	11/09/2021
8th Version (in effect)	12/13/2023	12/13/2023

Responsible	Area
Preparation	Corporate Governance
Review	Investor Relations Officer
Approval	Board of Directors

Exhibit I - Statement of Adhesion

I [name], enrolled under Individual Taxpayer ID [CPF] number, holding the position of [position], at [company] as a Covered Person, am subject to compliance with the provisions of CVM Resolution 44/2021 and hereby adhere to the Information Disclosure and Securities Trading Policy for Fras-le S.A., and hereby DECLARE:

(a) to have knowledge of the content of this Policy, which is available on the Intranet and on the Company's website (<https://ri.fraslemobility.com/>), committing to always guide my actions in accordance with such rules and applicable legislation and regulations;

(b) to be aware of the predefined restriction periods for trading securities preceding the disclosure of the quarterly and annual information provided in the Policy, and that said periods are set annually by the Company and its subsidiaries by means of the Annual Corporate Events Calendar, available on the Company's website;

(c) to have knowledge that, if I am identified as a source of leakage of information, I shall be subject to, as applicable, the sanctions set out in the Company's Code of Ethical Conduct and other measures deemed necessary to protect the Company's interests and recover any losses, including reporting to the competent authorities;

(d) to have knowledge that the Company's accredited broker is _____

(e) under the terms of this Policy, the Related Persons are:

Name of the Related Person	Individual Taxpayer ID (CPF)	Relationship	
		Spouse/partner	
		Income Tax Dependent	
		Spouse/partner	
		Income Tax Dependent	
		Spouse/partner	
		Income Tax Dependent	
	Corporate Taxpayer ID (CNPJ)	Relationship	
		Subsidiary	
		Trust Agreement	
		Portfolio Manager	
		Subsidiary	
		Trust Agreement	
		Portfolio Manager	

The declarant authorizes the Company to: (i) access any information registered with the recording bank referring to the trading of securities issued by the Company, its derivatives, or any other securities referenced to them; and (i) send to the Securities and Exchange Commission (CVM) information regarding the ownership and trading of securities issued by the Company, its derivatives, or any other securities referenced to them, whether as the Declarant, spouse/partner, income tax dependent, and directly or indirectly controlled companies, pursuant to CVM Resolution 44/2021.

The declarant signs this document through the digital platform commonly used by the Company for all legal purposes and effects.

[Location], [month] [day], [year].

[Signature]

[Name of the declarant]

Exhibit II - Information on Trading of Securities

Article 11 of CVM Instruction 44/2021

Month: _____ Year: _____

() only the following transactions with securities and derivatives took place, in accordance with Article 11 of CVM Instruction 44/2021.

() there were no transactions with securities and derivatives, in accordance with Article 11 of CVM Instruction 44/2021, as the case may be, and I hold the following positions in securities and derivatives.

Company		Subsidiary		Parent Company		
Name:		Individual Taxpayer's ID (CPF)/Corporate Taxpayer's ID (CNPJ):				
Complete Address:						
Intermediary Broker for trading activities:						
Opening Balance						
Security	Characteristics	Amount traded	Equity interest (%)			
			Type	Total		
Changes						
Security	Characteristics	Transaction	Date	Amount traded	Price	Value (R\$)
		Purchase				
		Purchase				
		Total Purchases				
		Borrowed Shares				
		Borrowed Shares				
		Total Borrowings				
		Sale				
		Sale				
		Total Sales				
Closing balance						
Security	Securities Characteristics	Amount traded	Equity interest (%)			
			Type	Total		

Exhibit III - Individual Investment or Divestment Plan

By means of this Individual Plan, regulated by the Company's Disclosure of Information and Securities Trading Policy, I hereby express my commitment to investing or disinvesting in Securities, observing the provisions of applicable legislation and regulations, the aforementioned Trading Policy and, furthermore, the following conditions:

Name of the Participant of the Plan		
Name of the Company		
B3 Code (ticker) of the Security to be Traded		
Nature of Transaction:	() Purchase/Investment	() Sale/Divestment
Related Persons:	Name	Individual Taxpayer's ID (CPF)/Corporate Taxpayer's ID (CNPJ):
Intermediary Broker:		
Trading Period:		
Dates or events, allocated amounts, or number of transactions:	Dates/Events	Values/Amounts
Additional Information:		

By signing this Investment Plan, I express my commitment to:

- (a)** comply with the terms set forth therein, irrevocably and irreversibly, unless there is a justified and substantiated reason;
- (b)** observe the provisions of CVM Resolution 44, of August 23, 2021;
- (c)** not sell the Securities acquired as investments during a minimum period of 6 (six) months from their purchase date, except for reasons of force majeure;
- (d)** provide information to the Company, within 5 (five) days after the end of the month in which the purchase or sale of securities occurred, as provided in the Disclosure of Information and Securities Trading Policy;
- (e)** reimburse the Company for any avoided losses or gains obtained in trading with securities issued by it, arising from any change in the disclosure dates of quarterly accounting information and annual financial statements, if this Investment Plan contemplates trading activities during the period of 15 (fifteen) days preceding said disclosures. The amount to be reimbursed to the Company will be determined by the difference in the average share price on the Stock Exchange on the trading date informed in the Investment Plan, on the date it was originally disclosed, and on the day after its effective disclosure date. For shares that were purchased, if the acquisition date defined in the Investment Plan occurs prior to the effective disclosure date, when the original date should have been after, any positive difference in the average price after the disclosure and the price on the acquisition date shall be returned to the Company (reversal of gains earned). For shares that were sold, if the sale date defined in the Investment Plan occurs prior to the effective disclosure date, when the original date should have been after, any positive difference in the average price after the disclosure and the price on the sale date shall be returned to the Company (reversal of avoided losses).
- (f)** not carry out any transaction that annuls or mitigates the economic effects of the transactions determined by this Individual Investment Plan.

[Location], [month] [day], [year].

[Signature]

[name]

[position/relationship with the Company]

[Individual Taxpayer's ID (CPF)/Corporate Taxpayer's ID (CNPJ)]

Received:

Date: ____/____/____

[name and signature of the IRO]