

# Disclosure of Information and Securities Trading Policy



9th version and consolidation

12/11/2024

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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, as well as the maintenance of confidentiality regarding those not disclosed, 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;
- (e) the Members of the Company's Fiscal Council, when installed;
- (f) the members of any of the Company's technical or advisory bodies established by statutory provision; and
- (g) 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

- Law 6,385, of December 07, 1976, (Institutes the "CVM");
- Law 6,404, of December 15, 1976, ("Brazilian Corporation Law");
- CVM Resolution 44, of August 23, 2021, ("Resolution 44");
- CVM Resolution 80, of March 29, 2022, ("Resolution 80");
- Regulation of Level 1 of Corporate Governance of B3 S.A. Brasil, Bolsa, Balcão;
- The Company's Bylaws; and
- The Company's Code of Ethical Conduct.

## 4. Definitions

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

**Administrators:** members of the 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 supports the Investor Relations Officer in complying with this Policy.

**Material Act or Fact:** under Resolution 44, 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: (i) the price of Company securities or

references to them; (ii) the decision of investors to buy, sell or hold said securities; or (iii) 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 the Resolution.

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

**Employees:** non-statutory directors and professionals who have an employment relationship with the Company, its Parent Company, and/or its Subsidiaries.

**Company:** Fras-le S.A.

**Notice to the Market:** the instrument by which the Company discloses other information that is not conceptually classified as a Material Act or Fact, 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.

**Fiscal Council Members:** members of the Company's fiscal council, and their alternates, in the years in which the fiscal council has been installed by the general shareholders' meeting.

**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 or by the Board of Directors, 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, Board of Directors members, Fiscal Council members, directors, members of any bodies with technical or advisory functions, 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.

**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:** commitment assumed by Covered Persons to implement, in the long term, a sales or purchase plan, using their own funds, of securities issued by the Company, under this Policy and Article 16 of Resolution 44.

**Power of 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, permanently, directly or indirectly, the

majority of votes in deliberations at shareholders' meetings and the power to elect the majority of the Company's administrators.

**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, to be signed by the Covered Persons, in 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/bonuses, 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 according to 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.

## 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 may constitute 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, concerning a matter that may characterize Material Act or Fact, 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) preferably occur after the end of trades on the Stock Exchange and, if not possible, before its opening;
- (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
- (c) respect the prohibition of 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 Fiscal Council, 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 IR all the information required by Article 12 of 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), 10% (ten percent), 15% (fifteen percent), or multiples of this percentage, of the same type of shares that represent the Company's share capital.



**11.3.** The IR department must maintain on file the documents submitted by shareholders regarding the trading transactions. Upon receipt of a notice of purchase or disposal of relevant stake, it must also submit it to the CVM and the Stock Exchange through a specific system.

**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 offer, the IRO must also disclose this information, under this Policy and Resolution 44.

## **12. Disclosure of Information in Public Offerings**

**12.1.** Immediately following the decision to carry out a public tender offer 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, except for procedures that require confidential analysis.

**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 Resolution 44 have been met.

## **13. Disclosure of Information on Trading by Management and Linked Persons**

**13.1.** The Administrators, Fiscal Council members, and persons who are part of Bodies with Technical or Advisory Functions must declare to the IR department their ownership and trading of securities issued by the Company and its Parent Company who are publicly listed companies, including the borrowing of shares and trading with derivatives or other referenced securities.

**13.2.** 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 II, and the respective brokerage statements may also be sent within 5 (five) days after the completion of each trading transaction. 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.

**13.4.** In the first business day following investiture, the communication must contain only the securities held on the date of investiture, and the IR department will be responsible for submitting the information to the CVM and the Stock Exchange within legal time.

**13.5.** The declarations 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.

Future results and the creation of shareholder value may differ materially from those expressed or implied by the projections. The factors and figures that may determine these results are beyond

Management's control or its ability to make predictions, which is not required to update the presentation upon new information and/or future developments; and, 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.

**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) continuous monitoring of electronic correspondence; (ii) the strengthening of the Covered Persons' commitment to preserving the confidentiality of information; and (iii) signing of confidentiality instruments related to specific projects.

## **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 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 Fiscal Council, and the Company itself, regarding the trading of securities issued by the Company, have access to all Material Information that has not yet been disclosed;
- (c)** the parties mentioned in item "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)** the Administrator or Fiscal Council member that leaves the Company and has knowledge of Material Information, for the purposes of trading securities issued by the Company, this information shall be considered valid for 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 15 (fifteen) days preceding the disclosure date of the Company's quarterly accounting information and annual financial statements. This prohibition is regardless of the awareness of the content of said information, the existence of Material Information pending disclosure, or the 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 IR, indicating the starting date and lasting until a new statement informing the end of the Black-out Period is disclosed.

**18.3.** The prohibition of trading securities provided in item 18.1 shall not apply, as the case may be, to other situations provided in paragraph 3 of Article 14, 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 before 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, before 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 be carried out at least 3 (three) months after the plan has been presented, as well as its changes and cancellations;
- (b) the type of scheduled transactions (purchase or sale);
- (c) the dates or events and the approximate values or quantities of the transactions to be carried out;
- (d) the trading periods, which may not be less than 12 (twelve) months;
- (e) the names of the Related Persons; and
- (f) in the case of investment, the commitment not to sell the securities acquired under the Individual Plan before 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 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 can 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.

**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. Duties and Responsibilities of the IR Officer**

The responsibilities of the IRO include:

- (a) disclosing and ensuring 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, amendment or new disclosure of a Material Act or Fact;
- (e) receiving, with the support of the IR, 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) file, with the support of the Investor Relations department, the signed Adhesion Terms of the Covered Persons while they maintain a relationship with the Company, and for at least five years after their departure;
- (g) assessing that Individual Plans have been elaborated under 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;
- (h) 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
- (i) answering any questions related to this Policy.

## **22. Non-compliance with this Policy**

**22.1.** Failure to comply with this Policy will subject the violator to disciplinary measures, under the Company's internal rules, including its Code of Ethical Conduct and the Sanctions Policy, as well as the applicable penalties when classified as a serious violation as defined by the CVM.

**22.2.** 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, under Article 27-D of Law 6,385/76.

## **23. Training**

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

## **24. Final Provisions**

**24.1.** 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 on which the changes were informed to the parties.

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

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

**24.4.** 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 Fiscal Council, 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.

## **25. Control of Information and Parties Responsible for its Elaboration**

Version	Date	Term
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1 <sup>st</sup> version	06/17/2002	06/17/2002
2 <sup>nd</sup> version	10/21/2009	10/21/2009
3 <sup>rd</sup> version	04/28/2014	04/28/2014
4 <sup>th</sup> version	11/04/2015	11/04/2015
5 <sup>th</sup> version	12/05/2016	12/05/2016
6 <sup>th</sup> version	06/28/2019	06/28/2019
7 <sup>th</sup> version	11/09/2021	11/09/2021
8 <sup>th</sup> version	12/13/2023	12/13/2023
9 <sup>th</sup> Version (in effect)	12/11/2024	12/11/2024

<b>Responsible Party</b>	<b>Department</b>
Prepared by	Corporate Governance
Review	Investor Relations Department
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 under 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) under the terms of this Policy, the Related Persons are:

Name of the Related Person	Individual Taxpayer's ID (CPF)	Relationship	
		Spouse/partner (a)	
		Income Tax Dependent	
		Spouse/partner (a)	
		Income Tax Dependent	
		Spouse/partner (a)	
		Income Tax Dependent	
	Corporate Taxpayer's 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 (ii) 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, under CVM Resolution 44/2021, in compliance with the General Data Protection Law (Law 13,709, of August 14, 2018).

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 - CVM Resolution 44/2021

Month: \_\_\_\_\_ Year: \_\_\_\_\_

( ) only the following transactions involving securities and derivatives occurred, under Article 11 of CVM Resolution 44/2021.

( ) there were no transactions with securities and derivatives, under Article 11 of CVM Resolution 44/2021, and I hold the following positions in securities and derivatives.

<b>Company</b>				<b>Subsidiary</b>		<b>Parent Company</b>		
Name:				INDIVIDUAL TAXPAYER'S ID (CPF)/CORPORATE TAXPAYER'S ID (CNPJ):				
Complete Address:								
<b>Intermediary Broker for Trading Activities:</b>								
<b>Opening Balance</b>								
Security	Characteristics of the securities	Amount	Equity interest (%)					
			Type	Total				
<b>Trading Activities</b>								
Security	Characteristics	Operation	Date	Amount	Price	Value (R\$)		
		Purchase						
		Purchase						
		<b>Total Purchases</b>						
		Borrowed Shares						
		Borrowed Shares						
		<b>Total Borrowings</b>						
		Sale						
		Sale						
		<b>Total Sales</b>						
<b>Closing Balance</b>								
Security	Characteristics of the securities	Amount	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 Marketable Securities, observing the provisions of applicable legislation and regulations, the aforementioned Trading Policy and 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 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 before 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 before 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)]*

Received:

Date: \_\_\_\_/\_\_\_\_/\_\_\_\_

*[name and signature of the IRO]*