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# **DATA GOVERNANCE AND DATA MANAGEMENT POLICY**

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## 1 PURPOSE

The purpose of this Policy is to establish the principles and guidelines for the B3 Data Governance and Data Management, defining and responsibilities, controls and mechanisms that ensure that corporate data be treated as strategic assets, while maintaining their quality, integrity, availability, security, and regulatory compliance.

This Policy guides the activities of the Company's areas with regard to data management, in line with its principles, policies and applicable legislation, promoting decisions based on reliable, standardized and accessible data.

## 2 SCOPE

This Policy applies to all executive officers, employees, interns, suppliers, service providers and third parties who treat, access and use data under the responsibility of B3 S.A. – Brasil, Bolsa, Balcão (“B3”), its branch offices, subsidiaries abroad, as well as B3 Bank, BSM, B3 Social, and other associations in which B3 is a sponsor, honorary or founding partner (“Company”).

Its application covers all data, regardless of the format, origin, or technology, and should be interpreted in conjunction with other related corporate standards.

## 3 REFERENCES

- DAMA International – DAMADMBOK (2024) Revised Edition;
- Information Security Policy;
- Personal Data Protection Governance Policy;
- Communications Policy; and
- Information Technology Policy.

## 4 CONCEPTS

**Data Domain:** A data set under the responsibility of a business area, in accordance with the governance model established by the Company..

**Data Management:** A set of practices and processes aimed at planning, acquisition, organization, treatment, availability, quality, curation and analysis of data, pursuant to the guidelines established in this Policy.

**Federated Data Governance:** A model that defines guidelines for the strategic and ethical use of data, allowing each area to manage its domains autonomously, following common corporate standards.

**Metadata:** Structured information that describes and contextualizes data, facilitating its understanding, use, classification, access, and retrieval.

**Federated Data Platform:** Technological infrastructure that supports data storage, processing, analysis and provision within the Company's federated model.

## 5 GUIDELINES

- Commitment of the Board of Directors and its Advisory Committees, Executive Board and the Company's Executive Officers (Senior Management) to reinforcing the dissemination of data culture, ensuring the adoption of data management in a responsible and ethical manner, and in compliance with the Company's rules and with the legislation.
- The Company must provide quality, reliable and timely data and information, with uniqueness, accuracy, completeness, consistency, precision, validity, in compliance with regulatory obligations. All implemented technologies must adhere to best practices for the Company's Data Governance. Data and information must be considered as the Company's strategic corporate and high-value assets.
- Each Data Domain is responsible for treating its data as reusable, reliable, and governed products, with a focus on quality and value for the business.

The data must meet the following:

- Platform, architecture, governance and quality criteria, such as completeness, accuracy, consistency and timeliness.
- The use of data must respect privacy, current legislation, and the organization's ethical principles.
- The organization must foster understanding, appreciation and the strategic use of data by all its members.
- Establish clear roles and responsibilities for everyone involved in the data lifecycle, such as strategic stakeholders, technical experts, and users.
- Promote continuous training on good data management practices, with a focus on data domain autonomy.
- Utilize technological platforms that support a federated data model, with self-service, traceability and quality control.
- Encourage collaboration to ensure alignment and evolution of analytics maturity.
- Monitor data quality and maturity indicators, while fostering continuous improvement.
- Ensure that data is accessible only to authorized users, respecting legal and confidentiality restrictions.

## 6 RESPONSIBILITIES

The responsibilities of the main roles involved in the Company's Data Governance and Management are described below. They are focused on clarity of assignments and on promoting the use of data in a secure, strategic and reliable manner.

### 6.1 Board of Directors

- Reinforces the dissemination of a data culture within the Company, ensuring the adoption of responsible and ethical data management and governance practices, in accordance with Company regulations and legislation.
- Approves this Policy, as well as its updates.

## 6.2 Executive Board

- Supports the dissemination of a data culture within the Company, together with the Board of Directors, ensuring the adoption of responsible and ethical data management and governance practices in accordance with Company regulations and legislation;
- Reviews this Policy, as well as any updates thereto.

## 6.3 Governance, Integrated Management and Cyber Security Department

- Ensures compliance with and dissemination of this Policy.

## 6.4 Data Department

- Defines the data corporate strategy, promotes a data-driven culture, ensures technological infrastructure and proposes updates in the continuous evolution of this Policy and corporate standards related to Data Governance and Management.

## 6.5 Data Engineering

- Defines productization techniques, establishes good engineering practices, and supports domains in incident management and in data management and reliability.

## 6.6 Data Analytics Engineering

- Monitors analytical maturity, supports the efficient use of data, and ensures

the effectiveness of models, indicators, and data analytics solutions.

## 6.7 Data Governance and Management

- Promotes and provides transparency regarding data quality and standardization. Supports the dissemination of a data culture and maintains processes and controls in line with internal and external standards.

## 6.8 Data User

- Uses data ethically, responsibly and in line with the intended objectives, observing the Company's Personal Data Protection Governance, Information Security and Data Governance and Data Management Policies.
- Must understand the meaning, origin, and destination of data, as well as the associated business rules, thus avoiding misinterpretations.

## 6.9 Data Owner

- Responsible for strategic decision-making regarding data of its domain. Defines guidelines, approves access, ensures alignment with standards, and guarantees data quality, security, and integrity.

## 6.10 Business Data Steward

- Documents and classifies data within its domain, supports quality decision-making, participates in forums and training, and contributes to the consistent use of data in a business context.

## 6.11 Technical Data Steward

- Ensures the technical quality of data through rules, metrics and validations. Documents pipelines and systems, supports incident resolution, and ensures data integrity and traceability.

## 6.12 Data Engineer

- Creates and maintains data capture, transformation and consumption solutions, ensuring technical robustness, governance, and architectural alignment. May also act as a Technical Data Steward, when applicable.

## 6.13 Data Champion

- Promotes best practices, disseminates knowledge and fosters a data-driven culture within its domain, acting as an agent for user engagement and support.

## 6.14 Governance Partner

- Facilitates communication between data domains, identifies risks, supports training, and contributes to the alignment between the business, technology and governance areas.

## 6.15 Data Analytics Engineer

- Develops and maintains analytics solutions, defines analytics evolution journeys and supports the maturity of domains according to its needs.

## 7 FINAL PROVISIONS

The above provisions apply to the entire Company as of publication of this Policy.

## 8 CHANGE LOG

**Effective:** As of December 12, 2025.

**1st draft:** December 12, 2023.

**Areas responsible for the document:**

Responsible for	Area
Drafting	Data Governance and Management
Revision	Governance, Integrated Management and Cyber Security Department Legal Department Governance and Nomination Committee
Approval	Executive Board Board of Directors

**Updates:**

Version	Changed Section	Reason	Date
1	First draft	N/A	December 8, 2023.
2	General revision	General revision of the document, presenting the new data strategy in a streamlined format. Changes to the guidelines of this Policy were implemented to ensure adherence and consistency with B3's new data strategy, with the structuring of B3 Mesh, aimed at promoting decentralization and autonomy in data management and the discipline as a whole. The new approach will allow different areas to have quick and efficient access to relevant data, thus enhancing decision-making and creating new data perspectives.	December 12, 2025