



LISTED B3 REGULATORY DATA DISCLOSURE POLICY

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LISTED B3 REGULATORY DATA DISCLOSURE POLICY

1 PURPOSE

The purpose of this policy is to establish guidelines and procedures to be observed regarding the disclosure of regulatory data in B3's listed segment (Listed B3), as described below in item 5.1, disclosed at the frequency defined in item 5.2 and in the format described in item 5.3 (Listed B3 Regulatory Data), free of charge, on its website (B3 Portal) in compliance with articles 39 and 40 of CVM Resolution No. 135, dated June 10, 2022 (Policy).

2 SCOPE

This Policy applies to securities (by their nature or due to public distribution) traded or registered in the B3 S.A. – Brasil, Bolsa, Balcão (B3) environment.

3 REFERENCES

- CVM Resolution No. 80/2022;
- CVM Resolution No. 135/2022;
- CVM Resolution No. 160/2022;
- CVM Resolution No. 175/2022;
- Law No. 13,709/2018 – General Data Protection Law (“LGPD”);
- Complementary Law No. 105/2001 (“Bank Secrecy Law”); and
- B3 Portal Terms of Use.

4 PRINCIPLES

When disclosing the Listed B3 Regulatory Data under the terms set forth in this Policy, B3 must observe the following principles:

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- Availability of Listed B3 Regulatory Data under the terms and for the purposes set forth in the applicable regulation;
- Free and free-of-charge access to Listed B3 Regulatory Data;
- Data transparency;
- Security, prevention and integrity of Listed B3 Regulatory Data; and
- In the form of treatment and publication of data, ensure that the principles of confidentiality and secrecy are not violated.

5 GUIDELINES

5.1. Data Group:

The following data groups are considered Listed B3 Regulatory Data to be disclosed by B3 on the B3 Portal pursuant to this Policy:

- i. Reference Data (Article 39, III, CVM Resolution No. 135/2022);
- ii. Detailed Data (Article 39, IV, CVM Resolution No. 135/2022);
- iii. Aggregate Data (Article 39, V and VI, CVM Resolution No. 135/2022); and
- iv. Procedural Data (Article 39, VII and VIII, CVM Resolution No. 135/2022).

5.1.1. The following are considered Reference Data:

- i. Occasional and periodic data from issuers of securities admitted to trading on Listed B3 as soon as such data are received, as defined by CVM Resolution No. 80/2022, as amended.

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5.1.2. The following are considered Detailed Data:

- i. Data on each trade executed on Listed B3: name of the intermediaries responsible for each trade, identification of the securities traded, trade price, quantity traded and time;
 - i.1. Exceptionally for agricultural derivatives, which are traded without identifying the participant's ticker, the identification of intermediaries responsible for each trade will not be provided.

5.1.3. The following are considered Aggregate Data:

- i. Daily summary containing the security ratio, the underlying assets' minimum, maximum, weighted average, and reference price, as well as the settlement and EOD price, if any, fluctuation, the quantities traded, the number of trades and the financial volume traded on Listed B3.

5.1.4. The following are considered Procedural Data:

- i. The announcement of the adoption of special trading procedures, as set forth in the regulations applicable to Listed B3; and
- ii. The final decision to suspend the activities of Listed B3 participants, namely, legal entities, investment funds or vehicles to whom B3 has granted authorization to trade in its trading or trade registration environments or systems, taken in accordance with the procedures provided for in the regulations applicable to Listed B3.

5.2. Disclosure:

Listed B3 Regulatory Data will be disclosed and will remain available for free public access, while observing the principles indicated above, subject to the following terms and conditions:

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5.2.1. Reference Data will be disclosed as soon as they are received by B3.

5.2.2. Detailed Data:

- i. Will be disclosed throughout daily trading sessions, continuously and publicly, with a maximum delay of 15 minutes; and
- ii. Will remain available for 20 business days.

5.2.3. Aggregate Data:

- i. Will be published daily until trading starts on the following day; and
- ii. Will remain available for 18 months.

5.2.4. Procedural Data:

- i. Procedural Data will be disclosed as follows:
 - (i) Prior to their disclosure, as set forth in B3's regulations and manuals, in the event of announcements of adoption of special trading procedures; or
 - (ii) Until the end of the day on which the decision is made, in the event of suspension of a Listed B3 participant's activities; and
 - (iii) Will remain available for 5 years.

5.3. Format:

Listed B3 Regulatory Data will be available on the B3 Portal in a format that allows the general public to clearly identify their content, according to Listed B3 specific characteristics, and will remain available until the deadlines indicated above.

5.4. Changes:

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Upon CVM approval, B3 will communicate to the general public via the B3 Portal any changes in the content and/or format used for disclosing Listed B3 Regulatory Data prior to their implementation.

6 RESPONSIBILITIES

The following is incumbent upon B3:

- Ensure the availability of Listed B3 Regulatory Data on the B3 Portal and/or B3's service channels under the terms and conditions of this Policy;
- Carry out the necessary updates when disclosing Listed B3 Regulatory Data on the B3 Portal, whenever there are new services, products or changes that may reflect on Listed B3 Regulatory Data;
- Announce to the market, in advance and upon CVM approval, any change in the content and format used for disclosing Listed B3 Regulatory Data on the B3 Portal; and
- Assist clients regarding any queries and incidents related to Listed B3 Regulatory Data.

7 FINAL PROVISIONS

This Policy is effective on the date of its publication on the B3 Portal.

8 CHANGE LOG

Effective: As of December 01, 2023.

1st draft: December 01, 2023.

Areas responsible for the document:

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Responsible for	Area
Drafting	Data Governance and Operations Regulation and Capital Markets
Revision	Governance and Integrated Management Department Legal Department Listed Products Department Corporate Governance and Nomination Committee
Approval	Executive Board Board of Directors
Acknowledgment	Data Work Group

Updates:

Version	Changed Section	Reason	Date
01	First Draft	Adaptation to CVM Resolution No. 135/2022 (Articles 39 and 40)	December 01, 2023