

ESG POLICY – CURY



ESG
CURY

CONTENTS

Message from the CEO	2
Objective	3
Scope	4
References	5
Strategic pillars	6
Approach to ESG integration and stakeholder engagement	8
Customer satisfaction	8
Environmental commitment	8
Community and society	9
Product and project development	10
Investors / shareholders / governance	10
Supply chain	11
Communication channels	12

MESSAGE FROM THE CEO

We were founded in 2007, as the result of a joint venture between Cury Empreendimentos, a company derived from Curi Engenharia e Comércio Ltda., which in turn was founded in 1963 (by brothers Elias Calil Cury and Charles Calil Cury), and Cyrela, a leading residential developer in Brazil, founded in 1962, which focuses on the high-end segment.

Since we started up our activities, we have always sought to reduce the housing deficit in our country. We facilitate access to credit to make the dream of home ownership a reality for low-income families. Thus, the ESG (Environmental, Social and Governance) framework at Cury initiated with a strong focus on the social pillar, and we have now undertaken a greater commitment to the environmental and governance fronts.

ESG has always been an issue present in our operations, since we work with a focus on fostering positive social and environmental results, based on very high standards of governance. Within this framework, we have successfully implemented our corporate strategy, contributing to the achievement of some of the Sustainable Development Goals set forth by the United Nations.

We believe that companies which effectively adhere to good ESG practices take greater awareness and responsibility in their actions and choices, and are capable of generating benefits not only for their businesses, but also for their clients and society.

Our ongoing success is underpinned by a relationship of trust with our clients and all of our business partners. We are committed to operating according to best practices at our construction sites, aimed at mitigating environmental impacts, providing safe, healthy, and equitable conditions to both our professionals and society, while ensuring the highest levels of governance.

We hope to count on the support of all of you.

Fabio Cury

CEO of Cury Construtora

OBJECTIVE

Aware of the economic, social and environmental impact of Cury Construtora e Incorporadora S.A. ("Cury" or "Company"), this Environmental, Social and Governance (ESG) Policy ("ESG Policy" or "Policy") is intended to establish business principles and guidelines aimed at aligning the Company's strategic decisions and operational activities with its objectives of environmental sustainability, social responsibility and governance practices.

SCOPE

This ESG Policy applies to all professionals of the Company, at all hierarchical levels, including members of management, employees, interns and outsourced personnel. It also applies to partners, suppliers, service providers and any person or entity that may engage in a relationship with the Company (all persons referred to herein as the "ESG Agent").

It is the responsibility of each ESG Agent to seek to enhance their conduct, and incorporate the provisions of this Policy into their work routine, exercising their assignments in light of the principles and guidelines established herein, in furtherance of the Company's commitment to the ESG agenda.

REFERENCES

Corporate Bylaws

Code of Ethics and Conduct

Internal Regulation of the Board of Directors

Internal Regulation of the Fiscal Council

Internal Regulation of the Non-Statutory Audit Committee

Trading Policy

Disclosure Policy

Related-Party Transactions Policy

Risk Management Policy

Nomination Policy

Compensation Policy

STRATEGIC PILLARS

From the standpoint of governance, Cury enjoys a robust structure guided by its values of ethics, transparency, responsibility, competence and soundness. With shares traded on the B3 S.A. - Brasil, Bolsa, Balcão ("B3") since 2020, the Company complies with several practices, embodied in regulations and policies, prepared in accordance with the rules set forth by the Brazilian Securities Commission (CVM), the regulations of the B3 Novo Mercado, and in line, whenever applicable, with the good practices recommended by the Brazilian Code of Corporate Governance - Publicly-Held Companies. In addition, since 2007, Cury has established its Board of Directors, one of the Company's key corporate governance bodies.

In addition to the organizational guidelines set out in the Company's policies and by-laws, the implementation of a certified quality management system also stands out, based on the requirements laid down by the ABNT NBR ISO 9001 and PBQP-H standards, which represents the Company's commitment to the continuous enhancement of its products and processes, always seeking to meet the expectations of its clients and all of its stakeholders.

Thus, the ESG Agent is responsible for complying with and implementing the provisions set forth in the Company's policies and regulations, in order to ensure efficacy and effectiveness to the structure designed for this purpose, as well as to guide its performance based on the following values and guidelines, which reflect the Company's collective commitment:

Mission

To actively contribute to the sustainable development of Brazil, by helping people achieve the dream of home ownership, while understanding and respecting our clients and society.

Vision

To be a benchmark in housing, being acknowledged for efficiency in construction, allied to best sustainability practices, timely delivery, along with suitable commercial and financial solutions for our clients.

▲ **Ethics**

To conduct relationships with clients, suppliers, employees, investors, and partners with integrity, respect, and transparency, while respecting competitive practices for the sake of preserving competition.

▲ **Responsibility**

Social, environmental and governance responsibility make up the Company's values. Thus, as far as environmental issues are concerned, the Company prioritizes the enhancement of processes and initiatives related to waste management, within the scope of civil construction, in addition to endeavoring to revitalize and rehabilitate degraded areas within the scope of the projects it develops, committing itself to the reurbanization of such areas, with a view to

ESG Policy – Cury

improving the quality of life of local communities and the society in general. Within this context, the Company relies on the commitment of the ESG Agents in the unrelenting pursuit of the Company's objectives and values, the development of humanized leaders who are committed to internal and external relations in a healthy way, while valuing growth opportunities, so as to meet the challenges posed by the reduction of the housing deficit in the country.

• **Transparency**

Transparency is one of the cornerstones of the Company's corporate governance system. Throughout the processes, decisions, and corporate organization, the ESG Agent must seek clarity to stakeholders, placing the Company in a position of acknowledgement within the real estate market, while assisting in the construction of solid and trustworthy relations, always showing respect for the collectivity.

• **Competence**

The Company seeks to establish a tiered competency model at its various levels, aiming to include multidisciplinary agents in the formulation of its business strategy. Thus, the transformation capacity is grounded not only on the Company's financial management performance, but also on the disruptive innovation of human capital, thereby challenging traditional approaches.

In the macro environment regarding the competence of its professionals, the Company adopts tools that aim at the training, as well as the individual and collective development of its professionals, with a view to identifying points for improvement and opportunities within their goals and, of course, competencies, thereby assisting them in managing individual performance and, consequently, that of the Company.

• **Soundness**

The Company's track record and its corporate profile substantiate the soundness of the brand. We are one of the leaders in the civil construction segment for housing, but we still maintain the intent and room for future growth, while being committed to the objectives of sustainable development. Some of our pillars towards strengthening corporate solidity are:

- ☐ Landbank strategically located;
- ☐ Low-cost, high-quality engineering, based on expertise acquired since the beginning of our operations;
- ☐ Comprehensive product portfolio, covering a wide range of options for our clients;
- ☐ Efficient and differentiated sales strategy within the segment;
- ☐ Continuous track-record of growth, aiming at very high levels of return and execution capacity.

APPROACH TO ESG INTEGRATION AND STAKEHOLDER ENGAGEMENT

We value transparent, ethical, respectful, and consistent relations with all internal and external audiences with whom we relate, collectively called "stakeholders". The interaction with these audiences is carried out by distinct departments of the Company.

We understand that relations with stakeholders can boost the growth of the Company's businesses. Based on this approach, we seek to promote positive results throughout the Company's sphere of influence, by adopting an ethical and responsible conduct, while considering our socio-environmental guidelines as key inputs in our dialogues.

CUSTOMER SATISFACTION

Transforming people's lives, with special emphasis on the low-income population, by providing access to decent housing and, consequently, fighting the housing deficit, is one of our missions. Within this mission, the pillars of safe occupation, the right to health, basic sanitation, and access to clean drinking water are also part of our objectives, as we perform the necessary adjustment in the surrounding infrastructure of our developments, in addition to our personalized advisory services to promote access to real estate credit, making possible the dream of home ownership to our customers.

Customer satisfaction is one of our main indicators when it comes to the success of our mission, based on which we guide our decisions and implement continuous improvements in our processes.

At any time, customers can contact us through our digital channels and call centers. Our employees are trained to serve them in an efficient manner, with promptness and cordiality, aiming at providing quality service.

We have introduced measures in our processes, which aim to protect customer data and information, in accordance with the General Data Protection Law.

ENVIRONMENTAL COMMITMENT

We value the protection of the environment, and the fostering of environmentally sustainable initiatives. The commitment to environmental protection is one of our priorities, from the moment we choose and prepare the land where our projects will be developed. We do not hesitate in acquiring degraded and challenging areas, from the perspective of environmental recovery and forest management. These practices also aim to further strengthen the social pillar, which has also been a major priority regarding our activities, since it provides for the revitalization of these areas, in addition to short- and medium-term social gains to society and the local community.

These guidelines are essential for the development of our products, and extend throughout all stages of construction, in a constant effort to rationalize the consumption of materials and resources.

Throughout the entire construction process, we must comply with the requirements of environmental legislation at the municipal, state, and federal levels, seeking to ensure that the use and consumption of natural resources are performed in a conscious and sustainable manner, including the adequate management of construction waste.

It is the responsibility of each ESG Agent, according to their respective assignments in the Company, to care for the protection of the environment, especially through the promotion of the above-mentioned practices, by fostering a culture of constant concern with the environment and the health of all concerned.

COMUNIDADE E SOCIEDADE

Our goal is to generate a positive impact on the communities where we operate. To this end, we constantly seek opportunities that allow us to engage with institutions, which promote the well-being and improvement of the quality of life of the population.

From the preparation of the land and the subsequent rehabilitation of contaminated areas, we are concerned with improving the quality of life of the community surrounding our projects and our clients, by directly encouraging the local commerce, infrastructure, urban transportation, safety, among other factors, including those related to governmental agencies.

During the construction period, we value the friendly relationship with the neighborhood. Thus, before the implementation of the construction sites, we carry out initiatives to prevent possible impacts, as well as to promote a close and reliable relationship with our neighbors.

These initiatives are carried out by means of notifying neighbors about the real estate project to be carried out by the Company, by means of a previous inspection to check the status of neighboring buildings, and by means of the appropriate treatment in case of impacts of the construction work on neighboring buildings.

Furthermore, the Company's Code of Ethical Conduct addresses the Company's concern with the quality of life in the workplace, by establishing a series of guidelines and criteria on labor relations, benefits, development, diversity, inclusion, health, well-being, and safety.

The management of our professionals complies with the policies and guidelines laid down in Brazilian legislation and standards, with a constant concern for the health, safety, and physical and mental well-being of everyone. To this end, we understand that mutual respect among people is crucial, regardless of their hierarchical position, origin, color, ethnicity, culture, age, social level, physical ability, religion, and sexual orientation. of their hierarchical position, origin, color, ethnicity, culture, age, social level, physical capacity, religion, and sexual orientation, whereby we reject any practice of prejudice.

Política ESG – Cury

In-house programs and training are also under constant development, and we endeavor to motivate and qualify our leaders to disseminate knowledge, as well as to align these management guidelines, and to reinforce the culture of a work environment that is increasingly inclusive, pleasant, and productive to all employees.

Within this context, we encourage ESG Agents to base the performance of their activities, along with their relations with all stakeholders, on the provisions set forth in the Code of Conduct and Ethics, by becoming aware, raising their senses, pondering, and actively participating in internal processes, with a view to implementing the agendas described above.

The importance of our social pillar is also reflected in our strategic decision to focus on the profile of real estate intended for low-income populations, within the scope of government housing programs, in addition to the creation of jobs in civil construction.

We also conduct investments in partnerships with several educational institutions, grant sports sponsorships, and support social institutions that assist people in vulnerable and at-risk situations.

PRODUCT AND PROJECT DEVELOPMENT

Within this scope and our mission, we invest in innovation and continuous improvement, in order to become a benchmark in our area of operation, by creating modern products that meet the needs of our clients, of society, and that of our shareholders. Thus, we carry out our mission through a commitment to continuous improvement of processes and actions, in order to generate greater efficiency and development in line with social, governmental, and environmental standards. We also seek to maintain and further enhance the acknowledgement by the real estate market, and the civil construction industry as a reference in quality, efficiency, and delivery capacity, while always showing respect for human rights and improvement of working conditions.

During the development of our products, the social progress is also relevant, with regard to public mobility, improved urbanization conditions, revitalization of brownfields, forest management, as well as economic, social, and environmental integration.

INVESTORS / SHAREHOLDERS / GOVERNANCE

We value good corporate governance practices as a guide for the relations between partners, the board of directors, the executive board, supervisory bodies and other stakeholders. In this context, the Company has introduced rules that aim to promote the principles of transparency, ethics, equity, accountability and corporate responsibility.

Política ESG – Cury

We have intensified the anti-corruption measures, deriving from our Code of Ethical Conduct, which are committed to fighting all forms of corruption.

Our Securities Trading Policy establishes restrictions on the trading of shares issued by the Company by persons who may have access to material information, up to the disclosure of such information to the market.

Our Disclosure Policy of Material Facts, in turn, seeks to ensure the adequate disclosure of information to all our shareholders and investors, as well as to the market in general, while also ensuring the confidentiality of material information until it is disclosed to the market. All ESG Agents and investors have access to a whistleblowing channel, through which it is possible to report cases of non-compliance with the Brazilian legislation and the Company's internal guidelines. The cases are handled by an independent and impartial company, which forwards the reports received through the whistleblowing channel to the "ethics committee", represented by the CEO, HR and Legal Managers, guaranteeing confidentiality and anonymity in relation to the reports.

Communication efforts reinforce and help disseminate our culture of integrity.

Moreover, we rely on an Audit Committee, which is fully dedicated to identifying and improving our internal procedures, including those aimed at enhancing our efficiency and incorporating socio-environmental aspects into the Company's risk management.

We rely on the cooperation of all ESG Agents in complying with our corporate policies, as applicable.

SUPPLY CHAIN

Our procurement and service contracting process is focused on results, but also on innovation and sustainability. Therefore, our selection and hiring criteria, besides being technical, are also based on the concern that our partners encourage good environmental, social and governance practices, seeking to generate a positive impact throughout their value chain.

ESG Agents are encouraged to consider the above indicators when evaluating, selecting and retaining suppliers.



COMMUNICATION CHANNELS

For further information, please visit our investor relations website ri.cury.net or contact us by phone +55-11-3117-1487.