



PO.05 TRADING OF SECURITIES AND DISCLOSURE OF MATERIAL ACT OR FACT POLICY

Responsible Area: Board of Administration, Finance and IR

Creation: 08/12/2009

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1. PURPOSE

The Trading Securities and Disclosure of Material Act or Fact Policy aims to instruct the entire group described in item 6, following the scope described in item 4.1 of this document.

2. COVERAGE

This POLICY applies to all areas of Dexco, its managers and employees.

3. NORMATIVE REFERENCES

- Resolution CVM nº 44/2021;
- Dexco's Code of Conduct;
- Standard for Taking Disciplinary Measures NO. 44.

4. GENERAL PRINCIPLES

4.1. Scope

The Policy for Trading Securities and Disclosure of Material Acts or Facts ("POLICY") of Dexco SA ("Company") establishes guidelines and procedures to be observed by the Company and its related persons for (i) trading securities issued by the Company and its subsidiaries, or related to them, and (ii) disclosure of a material act or fact and maintaining the confidentiality of such information not yet disclosed under the terms of Resolution No. 44 of the Securities and Exchange Commission ("CVM"), of August 23, 2021, with the objective of disclosing complete and timely information to the competent bodies and the market, ensuring equality and transparency of this information to all interested parties, without privileging some to the detriment of others.

4.2. POLICY Administration

The Investor Relations Officer is responsible for the general management of the POLICY and, regarding the disclosure of the Material Act or Fact:

- Disclose and communicate to the markets and competent bodies (subitem 10.3), any material act or fact that occurred or related to the Company's business;
- Ensure the wide and immediate dissemination of the material act or fact;
- Disclose the material act or fact simultaneously to all markets where the securities issued by the Company are admitted to trading;
- Provide the competent bodies, when required, with clarifications on the disclosure of a material act or fact; and
- Inquire people who have access to material acts or facts, in the case of the previous subitem or if there is an unusual fluctuation in the quotation, price or traded quantity of securities issued by the Company or related to them, in order to ascertain whether they have knowledge of information that must be disclosed to the market.

4.3. Disclosure and Trading Commission

The Disclosure and Trading Commission ("Commission") will be chaired by a member of the Board, preferably an independent Director, or by the Investor Relations Officer. The Commission will be composed of at least 3 (three) and at most 5 (five) people appointed annually by the Board of Officers, among them, the members of this Board, the Company's Executive Board and the staff, and meet - whenever called by the Investor Relations Officer.

It is the responsibility of the Commission, about the POLICY:

- a) advise the Investor Relations Officer;
- b) review the Policy, recommending to the Board of Officers to propose relevant changes to the Board of Directors;
- c) clarify any doubts about the interpretation of your text;
- d) determine the actions necessary for its disclosure and dissemination, including with the Company's employees;
- e) review and approve, with the participation of at least 2 (two) members of the Commission, one of whom must be the Investor Relations Officer, the information disclosed to the market, before being published;
- f) previously analyze the content of the materials of the meetings with investors and analysts (road shows), teleconferences and public presentations that contain information about the Company;
- g) analyze the content of responses referring to official inquiries from regulatory and selfregulatory bodies;

- h) propose a solution for omitted and exceptional cases.

5. CONCEPTS

5.1. Security

The concept of security mentioned in this POLICY covers, in a non-exhaustive way, shares, quotas of funds or investment clubs whose regulation provides that their portfolio of shares is composed exclusively of shares issued by the Company, its subsidiaries or its parent company, debentures, commercial notes and promissory notes, subscription bonuses, receipts and subscription rights, futures contracts, options and other derivative financial instruments referenced thereto ("shares and/or securities").

5.2. Material Act or Fact

Any decision of the controlling shareholder, resolution of the general meeting or of the Company's management bodies, or any other act or fact of a political-administrative, technical, business, or economic-financial nature occurring or related to its business that is considered relevant or influence in a considerable way:

- In the quotation of shares and/or securities;
- In the decision of investors to buy, sell or hold shares and/or securities; or
- In the decision of investors to exercise any rights inherent to the condition of holder of shares and/or securities.

Examples of material acts or facts, provided that they can produce any of the above effects, among others, the following:

- Signing of an agreement or contract for the transfer of the Company's shareholding control, even if under a suspensive or resolute condition;
- Change in the Company's control, including through the execution, amendment or termination of a shareholders' agreement;
- Signing, amending or terminating a shareholders' agreement in which the Company is a party or intervener, or which has been recorded in the Company's own book;
- Entry or exit of a partner who maintains, with the Company, an operational, financial, technological or administrative contract or collaboration;

- Authorization to trade the securities issued by the Company in any market, national or foreign;
- Decision to cancel the registration as a publicly-held company;
- Merger, consolidation or spin-off involving the Company or related companies;
- Change in the composition of the Company's equity;
- Acquisition or disposal of relevant investment;
- Transformation or dissolution of the Company;
- Change in accounting criteria adopted by the Company;
- Renegotiation of debts;
- Approval of the stock option plan;
- Change in the rights and benefits of shares and/or securities;
- Splitting or grouping of shares or attribution of bonus;
- Acquisition of the Company's securities to remain in treasury or cancellation, and sale of securities thus acquired;
- Profit or loss of the Company and the attribution of proceeds, in cash;
- Signing or terminating a contract or failure to carry it out, when the expectation of its realization is public knowledge;
- Approval, alteration or withdrawal of the project or delay in its implementation;
- Beginning, resumption or interruption of the manufacture or sale of a product or the provision of a service;
- Discovery, change or development of technology or Company resources;
- Modification of projections (guidance) disclosed by the Company; and
- Request for judicial or extrajudicial recovery, petition for bankruptcy or filing of a lawsuit, administrative or arbitration procedure that may affect the economic and financial situation of the Company.

In addition to the examples described above, it is the duty of the managers and the executive board involved, the Investor Relations Officer and, if

necessary, the Company's Commission to analyze the concrete situations that may arise during its operations, always considering their materiality, concreteness or strategic importance, in order to verify whether or not such situations constitute a material act or fact.

5.3. Notice to the Market

If the Company deems it necessary to disclose information that does not have the characteristics described in sub-item 5.2, such disclosure may be made through a notice to the market. Examples, among others, of a notice to the market:

- Clarifications to requests made by the CVM and/or the stock exchanges and entities of the organized over-the-counter market in which the securities issued by the Company are admitted to trading ("stock exchanges and entities of the organized over-the-counter market");
- Disclosure of information on the acquisition or disposal of relevant equity interest, as provided for in CVM Resolution N°. 44/21;
- Monthly disclosure of trading of own shares for treasury, within the scope of the Company's Buyback Program; and
- Information that the Investor Relations Officer deems necessary or useful to disclose to the market, even if not required by regulation.

6. INDIVIDUALS OR LEGAL ENTITIES SUBJECTED TO THE POLICY

6.1. They are called Related Persons, subject to the POLICY:

- a) the controlling shareholders, direct or indirect, with exclusive or shared control, directors, members of the Board, the Fiscal Council, advisory committees to the Board and any bodies with technical or advisory functions created by statutory provision, and the Company;
- b) members of statutory bodies of companies in which the Company is the sole parent, provided that the company in which they were elected does not have its own securities trading policy;
- c) all employees of the Company and/or anyone who, by virtue of their position, function or position in the Company, its parent company, its subsidiaries or affiliates, has knowledge of a material act or fact;
- d) the spouse (from whom he is not legally or extrajudicially separated)

or partner, descendant(s), and any other dependent included in the annual income tax adjustment declaration of the persons indicated in letters “a” and “b”, including during the period of 3 (three) months from the date of removal or dismissal of these persons; and

- e) the persons mentioned in letters “a”, “b” and “c” of this sub-item who leave the Company, its parent company, its subsidiaries or affiliates, during the period of 3 (three) months from the date of removal or shutdown.

6.1.1. They are equivalent to the Related Persons:

- a) the managers of the portfolio and investment funds, companies or other institutions or entities in which the Related Persons are the only quotaholders or shareholders or in which they can influence trading decisions;
- b) any legal entity controlled directly or indirectly by the Related Persons; and
- c) any person who has had access to information relating to a material act or fact through or otherwise of any of the Related Persons.

7. DUTIES AND RESPONSIBILITIES OF LINKED PERSONS

In addition to observing the prohibitions on trading (item 8), the Related Persons must:

- Preferably use the Itaú Corretora de Valores S.A. to carry out trading of the securities dealt with in this POLICY, except for the persons mentioned in letters “a”, “b” and “d” of item 6, who are obliged to use said broker in the negotiations of the securities dealt with in this policy.
- Exclusively for the Related Persons mentioned in letters “a” and “b” of sub-item 6.1, inform the Investor Relations area if there are any changes in the information about your spouse or partner (a) from which they are not legally or extrajudicially separated and any other dependent included in the annual income tax adjustment return within 15 (fifteen) days from the date of the change.

- 7.1. It is also the responsibility of the persons referred to in letters “a” and “b” of subitem 6.1. and only to them:

- Communicate to the Investor Relations Officer or, in his absence, to the Company's Chief Executive Officer, the material act or fact of which they become aware; and
- Communicate to the CVM, after having heard the Commission, the material act or fact of which they are aware in case the Investor Relations Officer fails to comply with his duty to disclose or inform.

7.2. Guidance

The Company may disclose on its website www.dex.co/ir forecasts and future performance estimates, provided they are accompanied by the relevant assumptions, parameters and methodology adopted, in compliance with CVM regulations.

8. PROHIBITION OF SECURITIES TRADING

8.1. Prohibition of negotiation before and after the disclosure of a material act or fact

The Company and the Related Persons may not trade in securities issued by the Company and its subsidiaries, or related to them, from the date of knowledge until the day of disclosure, including, of the material act or fact to the market.

8.1.1. The prohibition provided for in sub-item 8.1 also applies to those who have a commercial, professional, or trusting relationship with the Company, such as independent auditors, securities analysts, consultants, and institutions that are part of the distribution system, which are responsible for verifying the disclosure of information before trading securities issued by the Company or related to them, as required by CVM regulations.

8.1.2. The Investor Relations Officer may maintain the prohibition provided for in sub-items 8.1 and 8.1.1, in addition to the day of disclosure of the material act or fact, whenever, at his/her discretion, trading in securities may harm the Company or its shareholders.

8.2. Exceptional Trading Prohibition Periods (“black-out period”)

The Investor Relations Officer may, regardless of justification or the existence of a material act or fact not yet disclosed, establish periods in which the Company and Related Persons may not trade in securities issued

by the Company and its subsidiaries, or referenced to them. Related Persons shall maintain confidentiality pursuant to sub-item 12.2.

The Investor Relations Officer may recommend exceptional periods of prohibition for the negotiations provided for in the Individual Investment or Divestment Plans referred to in sub-item 9.1.

8.3. Other Hypotheses of Prohibition to Trading

The persons mentioned in letters “a” and “b” of sub-item 6.1 will also not be able to trade in the situations below:

- a) If the persons have not expressed their intention to Itaú Corretora de Valores S.A. to trade shares and/or securities, until 10:30 am on the day on which they intend to trade. In this case, the Company, its subsidiaries, affiliates or another company under common control, may trade shares and/or securities for maintenance in treasury and/or replacement;
- b) If said persons have traded shares and/or securities, for up to three days, or 60% of working days, of the same week. This prohibition will not apply if the Company, its subsidiaries, affiliates, or other company under common control do not trade shares and/or securities (to be held in treasury and/or replaced) in the respective period; and
- c) On the day on which the Company's treasury, its subsidiaries, affiliates or other company under common control, trade shares and/or securities because of economic crises or facts that imply high volatility in quotations and/or low liquidity of market, or even, by determination of their respective Investor Relations Officers.

8.4. The Related Persons will not be able to:

- a) acquire (buy) shares and/or securities before 180 (one hundred and eighty) days have elapsed since the last disposition (sale) carried out on a stock exchange or in an organized over-the-counter market entity; or
- b) disposing (sell) shares and/or securities before 180 (one hundred and eighty) days have elapsed from the last acquisition (purchase) carried out on the stock exchange or in an organized over-the-counter market entity.

8.4.1. The Investor Relations Officer may, after hearing the Commission, and in individual cases, reduce this period, respecting, in any case,

the provisions of sub-items 8.9 and 8.10.

8.4.2. The period of 180 (one hundred and eighty) days mentioned in this item 8.4 does not apply to the hypotheses below, provided that the other conditions of this POLICY have been observed (including black-out periods):

- a) The acquisition (purchase) of shares held in treasury, through private negotiation and within the scope of the Company's share-based compensation program or stock options, duly approved at a general meeting (“Compensation Program”); and
- b) The disposition (sale) of shares acquired under the Compensation Program and limited to the number of shares acquired therein.

8.5. The Related Persons will not be able to trade shares and/or securities, from the moment in which studies or analyzes related to incorporation, total or partial spin-off, merger, transformation or any form of corporate reorganization of the Company or business combination, change in the control of the Company, including through the execution, amendment or termination of a shareholders' agreement, decision to cancel the registration of the publicly-held company or change in the environment or trading segment of the shares issued by it, as well as on a request for recovery judicial or extrajudicial and bankruptcy carried out by the Company itself; and

8.6. The Related Persons may not rent or loan shares and/or securities issued by the Company or related to them (“rent or loan of shares or securities”).

8.7. The Related Persons may not carry out operations of any nature with call options or put options on shares and/or securities, the sale of shares and/or securities on the Forward Market and the trading of shares and/or securities on the Futures Market.

8.8. The Related Persons may not trade in the period between the decision, taken by the competent corporate body, to increase the share capital, distribute dividends, bonus shares and/or securities referenced thereto, approve a split, reverse split, share subscription and/or securities, and the publication of the respective notices or announcements.

8.9. Prohibition of negotiation before and after the disclosure of the Company's financial statements

The prohibition on trading also applies in the period of 15 (fifteen) days prior to: (i) the disclosure of the Company's quarterly (ITR) and annual (DFP) information; or (ii) the publication of the notice that makes them available to shareholders, according to the disclosure calendar for the current year (Annex A).

The ban on trading also applies on the day after (i) the disclosure of the Company's quarterly (ITR) and annual (DFP) information, or (ii) the publication of the notice that makes it available to shareholders, according to the disclosure schedule of the current year (Annex A).

If preliminary or anticipated financial information is disclosed by the Company, the prohibition on trading provided herein will cease to be in force on the day following the disclosure.

8.10. Prohibitions to trading carried out by the Company itself

The Company may not acquire treasury shares in the cases provided for in sub-items 8.1, 8.2 and 8.9., except within the scope of the Investment or Divestment Program, disciplined in item 9. below.

The Company's Board of Directors may also not resolve on the acquisition (purchase) or sale (sale) of shares and/or securities if any agreement or contract has been entered into to transfer the Company's shareholding control, even under a suspensive condition or resolutive, or if an option or mandate has been granted for the same purpose, as well as from the moment in which studies or analyzes related to the merger, total or partial spin-off, merger, transformation or any form of corporate reorganization of the Company or combination of business, change in the company's control, including through the execution, amendment or termination of a shareholders' agreement, decision to promote the cancellation of the publicly-held company's registration or change in the environment or trading segment of the shares issued by it, as well as, about requests for judicial or extrajudicial recovery and bankruptcy made by the Company itself, and while the operation has not or made public by disclosure of a material act or fact.

8.11. Authorized trading hypotheses

The prohibitions contained in this POLICY do not apply, except for the restriction periods provided for in sub-item 8.9:

8.11.1. The acquisition of shares held in treasury, through private negotiation, within the scope of the stock option plan approved at the general meeting;

8.11.2. The exercise of the preemptive right of subscription, related to shares and/or securities previously acquired; and

8.11.3. The sale of securities arising from the exercise of the preemptive subscription right, provided that the securities that gave rise to the right have been in the portfolio for at least 180 days.

8.12. Trading Shares

The Company will periodically monitor the trades carried out with shares and/or securities by the persons mentioned in letters "a", "b", "c" and "d" of sub-item 6.1 of this POLICY.

8.13. Trading by Investment Funds

For the purposes of this POLICY:

- a) Negotiations carried out by investment funds in which the Related Persons are shareholders are not considered to be indirect or on behalf of third parties, provided that the trading decisions cannot be influenced by the shareholders; and
- b) It is assumed, assuming evidence to the contrary, that the trading decisions of the administrator and the exclusive fund manager are influenced by the fund's shareholder. On the other hand, this presumption does not apply to exclusive investment funds whose shareholders are insurance companies or open supplementary pension entities and whose objective is to invest funds from a free benefit plan ("PGBL") and a life plan that generates free benefits ("VGBL"), during the deferral period.

9. INDIVIDUAL INVESTMENT OR DIVESTMENT PLAN

9.1. The Company and the Related Persons may have a single individual investment or divestment plan ("Individual Investment or Divestment Plan"), through which negotiations will be allowed in the periods provided for in subitems 8.1, 8.3, 8.4 and 8.5, provided that:

9.1.1. The Individual Investment or Divestment Plan has a minimum duration of 3 (three) months and must be formalized in writing with the Investor Relations Officer before any negotiations are carried out;

9.1.2. Establish, irrevocably and irreversibly, the dates and amounts or quantities of the business to be carried out; and

9.1.3. Provide a minimum period of 3 (three) months for the Individual Investment or Divestment Plan itself, its eventual modifications and cancellation to take effect.

9.2. The Individual Investment or Divestment Plan may allow trading within the period provided for in sub-item 8.9, provided that:

- The Company has approved a schedule defining specific dates for the disclosure of the ITR and DFP forms;
- Oblige the participant to revert to the Company any avoided losses or gains obtained in trading with shares and/or securities, resulting from any change in the disclosure dates of the ITR and DFP forms, determined through reasonable criteria defined in the Individual Investment Plan itself or divestment; and

9.3. The Investor Relations Officer must evaluate and comment on the applicability of the Individual Investment or Divestment Plan considering current regulations and may refuse to file it with the Company if it is in disagreement with the POLICY or with the legislation in force.

9.4. The Company's Investor Relations area will file and maintain specific and individualized control of all Individual Investment or Divestment Plans of the Related Persons, and this area is responsible for informing the Investor Relations Director of cases of non-compliance.

9.5. The Board of Directors must verify, at least every six months, the adherence of the negotiations carried out within the scope of the Individual Investment or Divestment Plan.

9.6. The plan itself, its eventual modifications and its cancellation will take effect after, at least, 3 (three) months from the communication by the participant.

9.6.1. The Commission will request clarification from the participant in cases of non-compliance, as well as may request other

clarifications about the Individual Investment or Divestment Plan.

9.7. The Company, through the Investor Relations area, will forward the Individual Investment or Divestment Plan when required by regulatory and self-regulatory bodies of the markets in which the Company's securities are admitted to trading.

9.8. Participants are prohibited from carrying out any operations that nullify or mitigate the economic effects of the operations provided for in the Individual Investment or Divestment Plan.

10. PROCEDURE FOR PREPARING AND DISCLOSING A RELEVANT ACT OR FACT OR NOTICED TO THE MARKET

a) Procedure for Drafting

10.1. Participating Bodies

The document disclosing the material act or fact or notice to the market will be prepared by the Investor Relations area together with the areas involved in the operations that gave rise to said disclosure. The document must be approved by the Commission, with the participation of at least 2 (two) members, one of whom must be the Investor Relations Officer.

10.2. Disclosure document standard

The document of material act or fact or notice to the market must be clear and precise and use language accessible to the investing public.

b) Disclosure procedure

10.3. Recipients of the disclosure and responsible bodies

The Investor Relations area will disclose, under the supervision of the Investor Relations Officer, the material act or fact, as a priority and simultaneously:

- a) CVM, and if applicable, stock exchanges and organized over-the-counter market entities; and
- b) to the market in general, as indicated in sub-item 10.10.

10.4. Simultaneous disclosure

The material act or fact broadcast by any means of communication or in meetings with class entities, investors, analysts or with a selected public, in the country or abroad, must be simultaneously disclosed to the market(s) in which the securities issued by the Company are admitted to trading.

10.5. Time of disclosure

The disclosure of the material act or fact or notice to the market should preferably occur, after the closing of business on the stock exchanges and entities of the organized over-the-counter market. If disclosure is necessary before the opening of the trading session, it should be made, whenever possible, at least 30 (thirty) minutes in advance.

10.5.1. If the securities issued by the Company are admitted for simultaneous trading in markets in different countries, the disclosure of the material act or fact or communication to the market must be made, whenever possible, outside trading hours in all countries, prevailing, in case of time incompatibility, the opening hours of the Brazilian market.

10.6. Suspension of trading

If it is imperative that the disclosure of a material act or fact occurs during trading hours, the Investor Relations Officer may request, always simultaneously to the stock exchanges and entities of the organized over-the-counter market, national and foreign, the suspension of the trading of the securities issued by the Company, or related to them, for the time necessary for the adequate dissemination of the material act or fact, observing the procedures provided for in the regulations issued by the stock exchanges and entities of the organized over-the-counter market on the subject.

10.7. Hypothesis of non-disclosure of material act or fact

Material acts or facts may exceptionally not be disclosed if the controlling shareholders or managers understand that their disclosure will jeopardize the Company's legitimate interest.

10.8. Immediate disclosure

The Investor Relations Officer shall immediately disclose the material act or fact mentioned in sub-item 10.7 if the material act or fact escapes control, if there is an unusual fluctuation in the quotation, price or traded

quantity of securities issued by the Company or related to them or if the CVM decides to disclose.

10.8.1. When applicable, the Investor Relations Officer will provide the necessary clarifications to the stock exchanges and/or entities of the organized over-the-counter market.

10.9. Rumours

The Company will not comment on rumors existing in the market about it, unless such information can significantly influence the price of its securities or if official questioning is received by regulatory and self-regulatory bodies.

10.10. Adequate means and instruments for disclosure

The disclosure to the market required by law will take place:

- a) Through publication in widely circulated newspapers commonly used by the Company; and
- b) By electronic means on the Company's page on the world wide web (Internet) www.dex.co/ir.

Additionally, the Company may disclose the material act or fact through the following means:

- a) news portal with a page on the world wide web, which makes available, in a section available for free access, the information in its entirety;
- b) electronic mail (e-mail);
- c) conference call;
- d) public meeting with class entities, investors, analysts or interested public, in the country or abroad;
- e) press releases and news distribution mechanisms (wires); and
- f) social media.

Disclosure by means of publication in newspapers may be carried out in a reduced form, provided that the addresses on the world computer network (Internet) are indicated where the complete information will be available to the interested public, in a content at least identical to that sent to the bodies referred to in the letter "a" of sub-item 10.3.

The material act or fact may be subject to internal disclosure for general

knowledge.

10.11. Person authorized to comment on the content of the material act or fact

Only the Investor Relations Officer, or the persons appointed by him, or, in their absence, the persons appointed by the Chief Executive Officer of the Company, are authorized to comment, clarify or detail the content of the material act or fact.

11. DISCLOSURE OF INFORMATION REGARDING QUARTERLY, HALF-YEAR AND ANNUAL RESULTS

11.1. Results related information

The Investor Relations Officer shall establish and disclose to the market, in advance compatible with market standards and rules contained in regulation and self-regulation, the dates on which the quarterly, half-yearly or annual results, duly audited, of the Company will be released.

The quarterly, semi-annual, or annual results or information disclosed must be prepared in accordance with the accounting standards adopted by the market.

11.2. Preliminary information or advance disclosure

Notwithstanding the results disclosure dates established under the terms of sub-item 11.1, the Commission may, subject to the criteria of opportunity and convenience:

- a) approve the disclosure of preliminary information, not yet audited, related to the Company's quarterly, half-yearly or annual results; or
- b) approve the anticipation of the disclosure of the Company's quarterly, half-yearly or annual results, duly audited.

12. CONFIDENTIALITY CONTROL MECHANISMS OF INFORMATION RELATING TO A RELEVANT ACT OR FACT

12.1. Objective

The mechanisms for controlling the confidentiality of information relating to a material act or fact aim to ensure the effectiveness of preserving the confidentiality of such information until its disclosure to Organs competent bodies and to the market.

12.2. Duty of secrecy

The Related Persons must keep the information related to a material act or fact confidential until its disclosure, as well as ensure the maintenance of this secrecy, addressing the matter only with people who have a strict need to know it and not use it for the purpose of obtaining advantage, for themselves or for others, in the securities market, ensuring that subordinates and third parties they trust also do so, being jointly and severally liable with them in the event of non-compliance.

12.2.1. Related Persons must keep the environment in which the Relevant Information is stored and transmitted (emails, files, etc.) safe, preventing any type of unauthorized access, as well as restricting the sending of information to third parties in a way that is not adequately protected. Information regarding a material act or fact should always be discussed in restricted and nonpublic places.

12.2.2. Related Persons must emphasize the responsibility and duty of secrecy to those who have knowledge of the information related to an undisclosed material act or fact, reinforcing that such information must not be discussed, including with the family members themselves.

12.2.2.1. Related Persons are also prohibited from providing or commenting on the media, by any means of communication, including through the world wide web (Internet) or social networks, any information relating to a material act or fact to which they have had access due to the office or position they hold until its disclosure to the public.

12.2.3. The Related Person who leaves the Company, or who ceases to participate in the business or project to which the information related to a material act or fact refers, will continue to be subject to the duty of secrecy provided for in this POLICY, until such information is duly disclosed and to the deadlines established in this POLICY.

12.2.4. The Related Person who inadvertently communicates a material act or fact to any unrelated person prior to its disclosure to the market, will immediately inform the Investor Relations Officer of the improper communication, so that he can take the appropriate measures.

For the purposes of this POLICY and in accordance with Art. 13 of CVM Resolution No. 44/21, it is assumed that the Bound Person traded securities having relevant information not yet disclosed to the market and that he made use of such information in said trade, being that, if trading of securities is identified in an irregular manner, the provisions of item 15 - Sanctions, below.

13. DISCLOSURE OF INFORMATION ON THE ACQUISITION AND DISPOSAL OF RELEVANT SHAREHOLDERS' NEGOTIATIONS

13.1. Object

Any natural or legal person, or group of people, acting together or representing the same interest, who carry out relevant negotiations, under the terms of sub-item 13.1.1, must send to the Company, which, in turn, will send to the CVM, to the of securities and entities of the organized over-the-counter market, statement containing the information required in Annex B of the POLICY.

13.1.1. Relevant negotiation is the business or set of businesses through which the direct or indirect participation of the persons exceeds, up or down, the levels of 5% (five percent), 10% (ten percent), 15% (fifteen percent), and so on, of the type or class of shares representing the Company's social capital.

13.1.2. The obligations set forth in sub-items 13.1 and 13.1.1 also extend to the acquisition of any rights over the shares, and other securities and derivative financial instruments referenced in such shares, even if there is no provision for physical settlement.

13.1.3. In cases where the acquisition arises or has been carried out with the objective of amending the Company's composition or administrative structure, as well as in the hypotheses in which the acquisition generates the obligation to carry out a public offering in accordance with the applicable regulations, the acquirer shall also promote the disclosure at least by the same communication channels usually adopted by the Company, containing the information required in Annex B.

13.1.4. The communications referred to in this item 13 must be made, immediately after the consummation of the events set forth herein, to the Investor Relations area. In this case, the Reference Form

must be updated within 7 (seven) business days from the date of occurrence.

14. ADHERENCE TO THE POLICY

All employees must sign the term of commitment, as per Annex D, upon hiring.

Adherence to the terms of this POLICY, either physically or electronically, may also be requested later by the Compliance area whenever necessary, at which time the employee must declare that he or she knows all the terms of the POLICY and is obliged to comply with them in full.

The adhesion of the persons mentioned in letters "a", "b" and "d" of sub-item 6.1 will be under the responsibility of the Company's legal department, which will renew said membership annually.

This POLICY must be observed by the Company and the Related Persons, as defined herein, who must declare knowledge and adhere to the terms of this POLICY as provided in Annex C, and any omission in the declaration of knowledge and adhesion does not exempt the Related Persons of the duty to observe them.

15. SANCTIONS

Failure to comply with this POLICY will be subject to the application of appropriate disciplinary measures.

Violations committed by Related Persons referred to in letters "a" and "b" of sub-item 6.1 will be resolved by the Company's Board of Directors. For violations committed by the other Related Persons, the decision on the measures to be applied will take place in the Ethics Committee, which counts on the presence of the Presidency, Vice-Presidency, and Executive Boards of the Company.

15.1. Notice of Violation

Any person who adheres to the POLICY and becomes aware of its violation must report the fact to the Investor Relations Officer.

16. DURATION

This POLICY will take effect from its publication date and must be revised every 3 (three) years or at any time, whenever necessary.

17. APPROVAL

This Policy was approved by Dexco's Board of Directors.

POLICY FOR TRADING SECURITIES AND DISCLOSURE OF A MATERIAL ACT OR FACT ISSUE BY DEXCO S.A.

ANNEX A

CALENDAR FOR THE YEAR 2025

It includes periods of restriction for trading securities, or related to them, resulting from periodic events (Balance sheet/DFP and ITR) of Dexco S.A. and its publicly held parent company Itaúsa S.A.

Issuing Companies	Periodic Events	Restriction Periods for Trading Securities	Results Disclosure Date
DEXCO	Balance Sheet/DFP 31.12.2025	02.17.2026 to 03.05.2026	03.05.2026
	ITR – 1 st quarter/2026	04.21.2026 to 05.07.2026	05.07.2026
	ITR – 2 nd quarter/2026	07.21.2026 to 08.06.2026	08.06.2026
	ITR – 3 rd quarter/2026	10.20.2026 to 11.05.2026	11.05.2026
ITAÚSA	Balance Sheet/DFP 31.12.2025	01.20.2026 to 02.05.2026	03.16.2026
		03.01.2026 to 03.17.2026	
	ITR – 1 st quarter/2026	04.20.2026 to 05.12.2026	05.11.2026
	ITR – 2 nd quarter/2026	07.20.2026 to 08.11.2026	08.10.2026
	ITR – 3 rd quarter/2026	10.19.2026 to 11.10.2026	11.09.2026

**POLICY FOR TRADING SECURITIES AND DISCLOSURE OF
A MATERIAL ACT OR FACT ISSUE BY DEXCO S.A.**

ANNEX B

INDIVIDUAL FORM

**Trading by Managers and Related Persons - Art. 11 - CVM Resolution No.
44/2021.**

In.....(month/year)

() only the following transactions with securities (or related to them) and derivatives took place, in accordance with article 11 of CVM Resolution No. 44/2021.⁽¹⁾

() no transactions were carried out with securities (or related to them) and derivatives, in accordance with article 11 of CVM Resolution No. 44/2021, and I have the following positions in securities (or related to them) and derivatives.

Company name:							
Name:					CPF/CNPJ:		
Qualification:							
Opening balance							
Securities (or related to it) / Derivative	Title Characteristics ⁽²⁾				Amount	% in participation	
						Same Species/ Class	Total
Trading Shares							
Securities (or related to it) / Derivative	Title Characteristics ⁽²⁾	Intermediary	Operation ⁽³⁾	Day	Amount	Price	Volume (R\$) ⁽⁴⁾
			Buy				
			Total Purchases				
			Sell				
			Sales amount				
Final balance							
Securities (or related to it) / Derivative	Title Characteristics ⁽²⁾				Amount	% de participação	
						Mesma Espécie/ Classe	Total

Name of controlling party:							
Name:					CPF/CNPJ:		
Qualification:							
Opening balance							
Securities (or related to it) / Derivative	Title Characteristics ⁽²⁾				Amount	% in participation	
						Same Species/ Class	Total
Trading Shares							
Securities (or related to it) / Derivative	Title Characteristics ⁽²⁾	Intermediary	Operation ⁽³⁾	Day	Amount	Price	Volume (R\$) ⁽⁴⁾
			Buy				
			Total Purchases				
			Sell				
			Sales amount				
Final balance							
Securities (or related to it) / Derivative	Title Characteristics ⁽²⁾				Amount	% in participation	
						Same Species/ Class	Total

Name of Subsidiary:							
Name:					CPF/CNPJ:		
Qualification:							
Opening balance							
Securities (or related to it) / Derivative	Title Characteristics ⁽²⁾				Amount	% in participation	
						Same Species/ Class	Total
Trading Shares							
Securities (or related to it) / Derivative	Title Characteristics ⁽²⁾	Intermediary	Operation ⁽³⁾	Day	Amount	Price	Volume (R\$) ⁽⁴⁾
			Buy				
			Total Purchases				
			Sell				
			Sales amount				
Final balance							
Securities (or related to it) / Derivative	Title Characteristics ⁽²⁾				Amount	% in participation	
						Same Species/ Class	Total

- (1) When filling out the form, delete the lines that do not contain information.
- (2) Issue/series, convertible, simple, terms, guarantees, type/class, etc.
- (3) Indicate form of acquisition or disposal.
- (4) Quantity x price.

**POLICY FOR TRADING SECURITIES AND DISCLOSURE OF A MATERIAL
ACT OR FACT ISSUE BY DEXCO S.A.**

ANNEX C

DECLARATION

I,(name and qualification, including CPF or CNPJ number, as applicable) in quality of.....
....., I DECLARE, in compliance with the discipline of Resolution No. 44/21, which (acquired/alienated _____ shares/subscription bonuses/share purchase options/share subscription rights and/or securities) issued by DEXCO SA, having(reached/increased or decreased/extinguished)..... in% my share (direct or indirect), corresponding to (shares/subscription bonuses/stock options/share subscription rights/any rights over shares and/or other securities and derivative financial instruments referenced thereto, whether liquidation physical or financial) issued by DEXCO SA, as described below:

I – Purpose of my participation and target amount:

.....
.....

– I declare that the acquisition made by me does not aim to change the composition of the Company's control or its administrative structure:
(Check, as applicable).

I – Number of shares, subscription bonuses, as well as share subscription rights and share purchase options, by type and class, and other securities already held, directly or indirectly, by me or a person related to me:

.....
.....

III – Number of derivative financial instruments referenced to shares, whether physical or financial settlement:

.....
.....

IV – Indicate any agreement or contract regulating the exercise of voting rights or the purchase and sale of securities issued by the Company:

DEXCO _____

.....
.....

I also assume the commitment to immediately inform the Investor Relations area of any change in the positions reported herein that exceed, up or down, the levels of 5%, 10%, 15%, and so on, of type or class. of shares representing the Company's capital stock.

São Paulo,

POLICY FOR TRADING SECURITIES AND DISCLOSURE OF A MATERIAL ACT OR FACT ISSUE BY DEXCO S.A.

ANNEX D

ADHESION TERM FOR CONTROLLERS, ADMINISTRATORS AND MEMBERS OF STATUTORY BODIES

.....[name and CPF], undersigned, as a person subject to compliance with CVM Resolution No. 44/21, adheres to the POLICY FOR TRADING SECURITIES AND DISCLOSURE OF MATERIAL ACT OR FACT OF DEXCO S.A. ("POLICY"), of which you hereby receive a copy.

Declares to know the terms of the POLICY and CVM Resolution No. 44/21 and, by _____ (from which it is not judicially separated or included in the income tax return and by the controlled legal entities, directly or indirectly, namely:

Name / Corporate Denomination	CPF / CNPJ

It also declares that it is aware that:

- 1) The provisions of this POLICY are applicable to the disclosure of a material act or fact and to the trading of shares and/or securities issued by DEXCO S.A., or issued by its publicly-held parent company ITAÚSA S.A. or its subsidiaries, provided they are publicly-held companies;
- 2) the restriction periods for trading contained in Annex A of the POLICY must be observed, which will be fixed, at least, annually;

3) trading is prohibited if it is aware of any material act or fact not yet disclosed to the market;

4) are also prohibited: (i) the rent or loan of shares and/or securities; (ii) the exercise of call or put options by third parties and forward purchase and sale contracts; and (iii) the acquisition or disposal of shares and/or securities before 180 days have elapsed, counted, respectively, from the last disposal or acquisition;

5) the negotiations must be brokered exclusively by Itaú Corretora de Valores S.A.;

6) must be communicated, within 15 days, in the information about your spouse (from whom you are not judicially or extrajudicially separated) or partner, descendant(s) and any other dependents included in the IR statement and the legal entities controlled by them, directly or indirectly; and

7) the terms of the POLICY must be observed while maintaining a relationship with the Company, its parent company, its subsidiaries or affiliates, and for a period of 3 months after its removal or termination.

Any non-compliance with this POLICY, including by the linked persons identified above, will subject the adherent to disciplinary sanctions, without prejudice to the applicable administrative, civil and criminal sanctions.

.....,

POLICY FOR TRADING SECURITIES AND DISCLOSURE OF A MATERIAL ACT OR FACT ISSUE BY DEXCO S.A.

ANNEX E

ADHESION TERM FOR EMPLOYEES

.....[name and CPF], the undersigned, as a person subject to compliance with CVM Resolution No. 44/21, adheres to the POLICY FOR TRADING SECURITIES AND DISCLOSING A MATERIAL ACT OR FACT OF DEXCO S.A., of which he hereby receives a copy.

Declares to know the terms of these Policies and CVM Resolution No. 44/21, and undertakes to observe and comply with them in full.

It also declares that it is aware that:

- 1) the provisions of this POLICY are applicable to the disclosure of a material act or fact and to the trading of shares and/or securities issued by DEXCO S.A.;
- 2) the restriction periods for trading contained in Annex A of the POLICY must be observed, which will be fixed, at least, annually;
- 3) trading is prohibited if it is aware of any material act or fact not yet disclosed to the market;
- 4) The following are also prohibited: (i) rent or loan of shares and/or securities; (ii) the exercise of call or put options by third parties and forward purchase and sale contracts; and (iii) the acquisition or sale of shares and/or securities before 180 days have elapsed, counted, respectively, from the last sale or acquisition;
- 5) Trading should preferably be intermediated by Itaú Corretora de Valores S.A., where the controls of the links defined in this policy with Dexco S.A. are easier to be controlled;

6) within 15 days, any changes to your information must be communicated; and

7) the terms of the POLICY must be observed while maintaining a relationship with the Company, its parent company, its subsidiaries or affiliates, and for a period of 3 months after its removal or termination.

Any failure to comply with these Policies will subject the adherent to disciplinary sanctions, without prejudice to the applicable administrative, civil and criminal sanctions.

.....,

DEXCO

deca portinari hydra duratex castelatto ceusa durafloor

dex.co