

# NATURA COSMÉTICOS S.A.

## INFORMATION DISCLOSURE AND SECURITIES TRADING POLICY

### 1. Purposes

1.1. This information disclosure and securities trading policy of Natura &Co Holding S.A. (“Policy” and “Company”, respectively), created in accordance with the rules of the Brazilian Securities Exchange Commission (“CVM”), has the following purposes: (i) establish the procedures related to the disclosure of relevant acts or facts; (ii) establish good conduct standards that must be observed by Related Persons (as defined below); (iii) ensure compliance with the laws and rules that forbid the practice of insider trading; and (iv) establish the rules and guidelines that must be observed by the Company’s Investor Relations Officer, by the Disclosure Committee (as defined below) and by Related Persons in order to ensure the observance of the best practices for the trading of Securities (as defined below) and to maintain secrecy of Privileged Information (as defined below).

### 2. Scope

2.1. This Policy applies to Related Persons and Close Relatives (as defined below), even if they have not expressly adhered to this Policy by signing the Term of Adhesion, as per the model included in the **Exhibit** to this Policy.

### 3. References

3.1. This Policy uses as reference: (i) the corporate governance rules provided by the Company’s bylaws; (ii) CVM Ruling No. 358, dated January 3, 2002, as amended (“CVM Ruling No. 358”); (iii) the Corporations Act (as defined below); and (iv) the Brazilian Corporate Governance Code – Publicly-Held Companies.

### 4. Definitions

4.1. The following capitalized terms shall be interpreted according to their corresponding meaning, as indicated below:

“**B3**” is B3 S.A. – Brasil, Bolsa, Balcão.

“**Board of Directors**” means the board of directors of the Company.

“**Board of Director’s Members**” are the members of the Company’s board of directors.

**“Board of Officers”** means the Company’s statutory board of officers.

**“Close Relatives”** are persons who are related to Managers, Controlling Shareholders of the Company, Fiscal Council Members and members of the Committees, as follows: (i) the spouse, of whom he/she is not separated, whether on judicial or extrajudicial basis; the domestic partner; (iii) any dependents included in their annual income tax return; and (iv) the companies directly or indirectly controlled by the Controlling Shareholders, Managers, Committees members and Fiscal Council members or the persons listed in this Policy.

**“Committees”** are any statutory or non-statutory committees of the Company’s Board of Directors.

**“Communication to the Market”** is any kind of communication to the market made by the Company, including all documents disclosed by the Company through CVM and in the Company’s website, which may include, but is not limited to material facts, notices to shareholders and notices to the market.

**“Controlling Shareholder”** is the shareholder or group of shareholders connected by means of a shareholders’ agreement or under common control who hold partner’s rights that secure them, on a permanent basis, the majority of the votes upon resolutions of the general meetings and the power to elect the majority of the Company’s Managers (as defined below); and that effectively uses their power to direct corporate activities and guide the operation of the company's bodies, pursuant to the Corporations Act.

**“Corporations Act”** means Law No. 6,404, of December 15, 1976, as amended.

**“CVM”** is the Securities and Exchange Commission of Brazil, the capital market’s regulator.

**“Employees with access to Privileged Information”** are the Company’s employees and/or employees of the Company’s Subsidiaries who, due to their title, position or duties in the Company or its subsidiaries, have access to any Privileged Information.

**“Fiscal Council”** means the fiscal council of the Company, when instated.

**“Fiscal Council Members”** are the sitting and alternate members of the Company’s Fiscal Council, when instated.

**“Former Managers”** are persons who have been Managers but who no longer belong to the Company’s management.

**“Insider Trading”** is any trading of the Company’s Securities by the Related Persons who, due to circumstantial facts, have access to Privileged Information related to the business and the situation of the Company and/or its Subsidiaries, and use such information to their own benefit.

**“Investor Relations Officer” or “IRO”** is the Company’s statutory officer responsible for supplying information to investors, to the CVM, for updating the Company’s registration with the CVM, and for implementing and monitoring the compliance of this Policy.

**“Managers”** are the members of the Board of Directors, of the Board of Officers and any other body with technical or consultant functions as expressed in the Company’s statutory.

**“Market Entities”** means any stock exchange or over-the-counter market entities, in Brazil or abroad, wherein the Securities issued by the Company are traded or become admitted for trading.

**“Material Fact”** is any decision by the Controlling Shareholders, resolution of the general meeting or the Company’s management bodies, or any other act or fact of a political-administrative, technical, business or economic-financial nature, which has occurred or is related to the Company’s and/or its Subsidiaries’ business, which may considerably influence the (a) price of the Securities issued by the Company or referenced to them, or (b) investors’ decision to buy, sell or maintain such Securities, or (c) investors’ decision to exercise any rights inherent to the condition of holder of Securities issued by the Company or referenced to them. The list of examples of situations that may be considered material information can be found in article no. 2, single paragraph, of CVM Ruling No. 358.

**“Officer”** is any member of the Company’s statutory board of directors.

**“Privileged Information”** is any Material Fact that is yet to be disclosed to the market.

**“Related Persons”** are the persons indicated in article 13 of CVM Ruling No. 358, including the Company, Controlling Shareholders, Officers, Members of the Board of Directors, Fiscal Council Members, Employees with access to Privileged Information and, also, members of any Committee, or other statutory bodies of the Company that may be created with technical or advisory duties and any person who, due to their title or position at the Company or its Subsidiaries, may have knowledge of Privileged Information regarding the Company.

**“Securities”** are any shares, debentures, subscription warrants, receipts and subscription rights, commercial notes, stock options, indexes and derivatives of any kind, or also any securities or collective investment agreements issued by the Company or referenced to them which, by legal definition, are deemed securities.

**“Subsidiaries”** are the entities controlled, directly or indirectly, by the Company.

**“Term of Adhesion”** is the formal term of adhesion related to this Policy, which shall be signed in accordance with the model included in the **Exhibit**, in compliance with article 16, paragraph 1, of CVM Ruling No. 358. Is the legal instrument to confirm the signatory’s adhesion to this Policy,

who assumes the obligation to comply with it and protect it, to guarantee that the rules contained in it are being met by the people that are under its influence.

**“Trading”** or **“Trade”** is the act of buying, selling and/or lease of Company’s Securities.

**“Trading Restriction Period”** is any period in which the trading of Securities issued by the Company is forbidden by regulatory determination or by resolution of the Investor Relations Officer.

## **5. Guidelines**

5.1. This Policy is based on the following principles and objectives:

- (a) To provide appropriate information to the shareholders and the Market Entities;
- (b) To ensure full and timely disclosure of material facts, as well as ensure their confidentiality until they are disclosed;
- (c) To consolidate good corporate governance practices; and
- (d) To cooperate with the transparency and development of the Brazilian capital market.

## **6. Responsibilities of the Related Persons and the IRO**

6.1. Related Persons are responsible for:

- (a) observing and ensuring compliance with this Policy, as well as the applicable legislation;
- (b) whenever necessary, consulting the IRO regarding situations of conflict with this Policy, as well as reporting to the IRO situations which they believe require the immediate disclosure of a material fact, when material information becomes public or if there is an atypical fluctuation in the price or volume traded of the Company’s issued securities; and
- (c) maintaining the IRO fully informed about the Company’s business development and significant events, which may be deemed as material facts.

6.2. The IRO shall be responsible, without prejudice to the other powers and duties set out in this Policy, for:

(a) disclosing and communicating to the CVM, B3 and any other Market Entity, immediately after their awareness and analysis, any material fact occurred or related to the Company and/or its Subsidiaries;

(b) disclosing and communicating to the CVM, B3 and any other Market Entity, a Communication to the Market in situations they deem necessary;

(c) ensuring the full, immediate and simultaneous dissemination of a material fact in all markets in which the Securities issued by the Company are admitted for trading; and

(d) providing to the relevant bodies, when requested, additional clarifications to the disclosure of a material fact or Communication to the Market.

## **7. Disclosure of Information**

### **7.1. Disclosure Procedures**

7.1.1. The disclosure and immediate communication of a Material Fact to the CVM and Market Entities, as well as the adoption of other procedures established herein are the responsibility of the IRO, in accordance with the terms below:

(a) the disclosure shall be made simultaneously to the CVM and Market Entities, either before or after the trading hours in the Market Entities. If and when the Securities issued by the Company were simultaneously traded in the Brazilian and foreign Market Entities, the disclosure shall be made, as a rule, either prior or after the trading in all countries, and, in case of incompatibility, the operation times of the Brazilian market shall prevail; and

(b) the disclosure shall be made in full in the news portal used by the Company (as disclosed in its Registration Form) and on the Company's investor relations website: <https://ri.naturaeco.com/en/>

7.1.2. Those Related Persons who have access to facts or information that may be considered Material Facts shall be responsible for communicating such information to the IRO and shall verify if, after the communication, the IRO has taken the measures set out in this Policy and in the applicable legislation, in relation to the disclosure of such information.

7.1.3. In the event that Related Persons who have knowledge of a situation that involves a Material Fact, pursuant to Clause 7.1.2 above, verify the omission of the IRO in complying with his/her duty

to communicate and disclose to the market and, as long as the issue of maintaining the secrecy about the Material Fact does not result from a disclosure exception, as per Clauses 7.2.1 and 7.2.2 of this Policy, such Related Persons must immediately communicate the Material Fact to the CVM.

7.1.4. Whenever the CVM or Market Entities require additional clarifications from the IRO in relation to the communication and disclosure of a material fact, or if there is an atypical fluctuation in the price or trading volume of the Securities issued by the Company or referenced to them, the IRO shall inquire the persons with access to information on the material fact, so as to verify whether such persons have knowledge of the information that must be disclosed to the market.

7.1.5. The Company's Managers and other employees who may be inquired, as set out in this clause, shall immediately respond to the request made by the IRO.

7.1.6. In case it is imperative that the disclosure of Material Facts occur during trading hours, the IRO may request the simultaneous suspension of trading of Securities issued by the Company or referenced to them, to the Brazilian and foreign Market Entities where such securities are traded, for the necessary period of time in order to complete the appropriate dissemination of such information, in compliance with the regulations enacted by the corresponding Market Entities.

## **7.2. Disclosure Exceptions**

7.2.1. Exceptionally, a material fact may not be disclosed if any of the Controlling Shareholders or the Managers of the Company believe that its disclosure will put the Company's lawful interest at risk. In such cases, the procedures set out in this Policy shall be adopted in order to ensure the confidentiality of such material facts.

7.2.2. In case a material fact is related to transactions that directly and/or only involve any of the Controlling Shareholders, they shall inform the IRO and, exceptionally, they may instruct the IRO not to disclose a material fact, stating the reasons for which they consider that disclosure would put the Company's lawful interests at risk. In such cases, the procedures set out in this Policy shall be adopted in order to ensure the confidentiality of such material fact.

7.2.3. The Controlling Shareholders or Managers of the Company shall be required, either directly or through the IRO, to immediately disclose a Material Fact, in any of the following cases:

(a) information has become known by third parties not related to the Company and not related to the to the information that characterizes a material fact itself, and who are not bound to a non-disclosure agreement with the Company

(b) there are strong indications and substantiated concern that there has been a breach of the material fact's confidentiality; or

(c) there is atypical fluctuation in the share price or trading volume of the Securities issued by the Company or referenced to them, due to information related to a material fact.

7.2.4. If the IRO fails to take the necessary measures for the immediate disclosure aforementioned in this clause, it shall be incumbent, as the case may be, on the Controlling Shareholders or the Board of Directors, through its chairman, to take such measures.

7.2.5. The IRO shall always be informed of a material fact kept confidential and it is the IRO's responsibility, along with the other persons aware of such information, to ensure the adoption of appropriate measures to preserve confidentiality. Whenever those who have knowledge of a confidential material fact have doubts about the legitimacy of the reasons for not disclosing it, the matter may be presented to the CVM, in a confidential manner, as set out in the applicable rules.

### **7.3. Confidentiality Procedures**

7.3.1. Related Persons shall maintain confidentiality of the information related to Material Facts, to which they have privileged access due to their title, position or function held until its effective disclosure to the market, and ensure that subordinates and third parties they trust also do so, being jointly and severally liable, in case of non-compliance.

7.3.2. The procedures below shall also be observed by Related Persons:

(a) only persons deemed necessary for actions that may result in material facts should be involved;

(b) confidential information should not be discussed in the presence of third parties that are not aware of them, even if such third parties are not expected to be able to perceive the meaning of the matters discussed;

(c) confidential information should not be discussed at conference calls where there is no certainty of who the participants are;

(d) necessary and appropriate measures should always be taken in order to maintain the confidentiality of documents, in physical or electronic format, which contain confidential information (security, protection through password, etc.);

(e) rumors should not be commented on. Questions about any activity or rumor involving the Company and/or its Subsidiaries, which may be considered a material fact, should be directed to the IR department through the e-mail: ri@natura.net; and

(f) without prejudice to the responsibility of whomever is sharing confidential information, third parties not related to the Company and/or its Subsidiaries who need access to confidential information should always be required to sign a confidentiality agreement, wherein the nature of the information being exchanged must be specified, including a statement that the third party acknowledges its confidential nature and commits not to disclose it to any other person, nor to trade the Securities issued by the Company, prior to the disclosure of the information to the market.

7.3.3. When confidential information is required to be disclosed to the Company's and/or its Subsidiaries' employees, the person in charge of the transmission of such confidential information shall ensure the person who will receive the confidential information have knowledge of the provisions included in this Policy.

7.3.4. Any Related Person who, inadvertently or without authorization, communicates, whether in person or through third parties, a material fact prior to its disclosure to the market, by any means of communication, including through the press or at meeting of class entities, to investors, market analysts or to any selected audiences, in the Company's country of domicile or abroad, shall immediately report the occurrence to the IRO so that the latter may take the appropriate measures.

## **8. Trading of Securities**

### **8.1. Trading Prohibition**

8.1.1. The prohibitions set out in this Policy apply to (i) buying and/or selling of the Company's securities, carried out in Market Entities as well as transactions performed without the intermediation of an institution integrating the distribution system; and (ii) loan transactions of the Company's Securities carried out by Related Persons.

8.1.2. The prohibitions described in this Policy also apply to any trades directly or indirectly carried out by Related Persons and Close Relatives, including cases in which such transactions have been made by means of:

- (a) a company controlled by the persons mentioned above, whether directly or indirectly;
- (b) third parties with whom a management agreement, trust or investment portfolio management of financial assets has been executed;



(c) attorneys-in-fact or agents; or

(d) any persons who have had knowledge of Privileged Information, through any of the persons prevented from Trading, being aware that it is yet to be disclosed to the market.

8.1.3. For purposes of this Policy, the trading carried out by investment funds, the quota holders of which are the persons mentioned in the clause above, shall not be deemed an indirect trading, provided that: (i) the investment funds are not exclusive; and (ii) the trading decisions made by the fund's manager or investment funds manager cannot, in any way, be influenced by its quota holders.

## **8.2. Trading Restriction Period**

8.2.1. Related Persons are forbidden from Trading Company' Securities during the Trade Restriction Period.

8.2.2. In addition to the Trading Restriction Periods determined by the applicable laws and regulations, the IRO may decide on the imposition of a Trading Restriction Period. In such case, the IRO shall clearly point out to the Related Persons the start and end of effectiveness of such additional Trading Restriction Periods.

8.2.3. The IRO is not required to inform the reasons for determining the Trading Restriction Period.

8.2.4. In all cases, Related Persons shall keep confidential the reasons for the Trading Restriction Period determined by the IRO.

8.2.5. The lack of communication on the part of the IRO regarding the Trading Restriction Period shall not exempt the Related Persons from compliance with this Policy and the provisions of CVM Ruling No.358, in addition to other CVM rules.

## **8.3. Trading Restriction Period in case of non-disclosure of a Material Fact**

8.3.1. Related Persons shall be forbidden from Trading Securities until the disclosure to the market of the Privileged Information that they have access.

8.3.2. The restriction for Trading Securities also applies to the following situations:

(a) when (i) the acquisition or disposal of Securities by the Company and/or its Subsidiaries is in progress, or (ii) a preference or a mandate has been granted with such purposes and, in such cases, the restriction for Trading Securities will be valid for Related Persons only on the dates on which the Company Trades its own Securities; and

(b) if there is the intention to carry out a consolidation, spin-off (partial or total), merger, transformation or corporate reorganization of the Company or a process of Securities issuance.

#### **8.4. Trade Restriction Period Prior to the Disclosure of Financial Information**

8.4.1. Related Persons shall not Trade Securities, in the period of fifteen (15) days prior to the disclosure or publication, as the case may be, of: (i) quarterly information of the Company (ITR); (ii) standardized financial statements of the Company (DFP); and (iii) any early disclosure of the financial information mentioned in items (i) or (ii) of this paragraph.

8.4.2. The Trading Restriction Period of fifteen (15) days shall be anticipated in case of early disclosure of any financial information comprised in the filings referred in the items 8.4.1. (i) and (ii). In such case, the IRO shall inform the restrictions to the Related Persons, as soon as possible, after being aware of such early disclosure of the financial information.

#### **8.5. Trading Restriction Period for Former Managers**

8.5.1. Those Former Managers shall not Trade Securities for a period of six (6) months after they leave the Company or until the disclosure by the Company of a material fact related to any business or event initiated during the period of administration of the Former Managers, whichever occurs last, with due regard to the provisions in Clause 8.5.2 below.

8.5.2. If any Trading of Securities, even after the disclosure of the material fact, can interfere in the conditions of such trade or event, and such interference may cause a loss to the Company, your Subsidiaries or its shareholders, the Former Manager shall be forbidden from Trading Securities during a minimum period of six (6) months.

#### **8.6. Treasury Transactions**

8.6.1. The Company shall not Trade its own Securities during Trading Restriction Periods, being allowed, however, the issuance of new shares and/or the transfer of treasury shares as a result of the exercise and/or vesting of long-term incentive plans provided by the Company.

## **9. Amendments to the Disclosure and Trading Policy**

9.1. This Policy may be amended in accordance with the resolutions of the Board of Directors in the following situations:

- (a) when expressly determined in this respect by the CVM;
- (b) in view of the amendment of applicable legal and regulatory rules, so as to implement the necessary adjustments; and
- (c) when the Board of Directors, in the process of assessing the effectiveness of the adopted procedures, identify the need for amendments.

9.2. The amendment to the Company's Policy shall be notified to the CVM and the Market Entities by the Investor Relations Officer, as required by the applicable legal and regulatory rules.

9.3. This Policy shall not be amended in case the yet to be disclosed Material Fact is pending.

## **10. Miscellaneous**

10.1. After the execution of the instrument of investiture of new Managers and Fiscal Council members and after the appointment of the members of the Committees (if they are not included among those mentioned above), the execution of the instrument included in the **Exhibit** shall be required, in order to inform the new Manager, Fiscal Council Member and Committee member, of this Policy.

10.2. Any doubts regarding the provisions of this Policy, or the application of any of its provisions, shall be directly sent to the IRO, who shall provide the appropriate clarifications or guidance.

10.3. Any person who violates the provisions of this Policy shall be subject to the procedures and penalties established by the law and by other rules of the Company.

10.4. This Policy was approved by the Board of Directors and is currently in force as of this date.

10.5. Any violations of this Policy verified by the Related Persons shall be immediately informed to the Company, in the person of the IRO.

10.6. The Related Persons responsible for non-compliance with any provisions included in this Policy undertake to reimburse the Company and/or other Related Persons, fully and without limitation, for all losses arising, directly or indirectly, from such non-compliance.

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**EXHIBIT**

**NATURA COSMÉTICOS S.A.**

**ADHESION AGREEMENT**

I, [name], [nationality], [marital status], [profession], bearer of identity document number [please inform either CPF, RNE or passport number if not a Brazilian resident], resident and domiciled at [full address], hereby declare my adhesion to the Information Disclosure and Securities Trading Policy of Natura Cosméticos S.A., headquartered in São Paulo, State of São Paulo, Avenue Alexandre Colares, no. 1188, Parque Anhanguera, Zip Code 05106-000, enrolled in the roll of corporate taxpayers (CNPJ/MF) under no 71.673.990/0001-77, registered in the Commercial Registry of the State of São Paulo under the no. 35.300.143.183 (NIRE), hereinafter referred to simply as “Company”, in Compliance with CVM Instruction 358 of January 3, 2002, and approved by the Company’s Board of Directors at the Meeting held on December 22, 2020.

São Paulo, [insert date].

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Name:  
Position: