

GPS PARTICIPAÇÕES E EMPREENDIMENTOS S.A. SUSTAINABILITY POLICY

"Company"

1 Objective

The objective of this Policy is to define the principles and guidelines upon which the Company, and its directly or indirectly controlled companies - the "GPS Group" - will rely to define its corporate sustainability practices within the pillars of Environment, Social Responsibility, and Governance.

2 Scope

This Policy is applicable to all executives, partners, employees, suppliers, service providers, Customers, shareholders, and any third parties who are or may become associated with the Company, meaning any of its subsidiaries, whether directly or indirectly controlled.

3 Foundations of the Company's Sustainability Policy

This Sustainability Policy is based on the following:

- (i) The Ten Principles of the UN Global Compact applicable to organizations, which are the following:
 - 1) Companies must support and respect the protection of internationally recognized human rights.
 - 2) Companies must ensure their non-participation in the violation of these rights.
 - 3) Companies must support freedom of association and the effective recognition of the right to collective bargaining.
 - 4) Companies must ensure the elimination of all forms of forced or compulsory labor.
 - 5) Companies must ensure the effective abolition of child labor.
 - 6) Companies must eliminate discrimination in employment.
 - 7) Companies must support a preventive approach to environmental challenges.
 - 8) Companies must develop initiatives to promote greater environmental responsibility.

Policy approved by the Board of Directors of GPS Participações e Empreendimentos S/A at a meeting held on May 4th 2023, signed by the Chairman of the Board and by the Secretary, being filed at the Company's headquarters, as resolved.

José Caetano Paula de Lacerda
Chairman of the Board

Cláudio Petruz
Secretary

- 9) Companies should encourage the development and dissemination of environmentally friendly technologies.
 - 10) Companies should combat corruption in all its forms, including extortion and bribery.
- ii) The Seventeen Sustainable Development Goals established by the UN General Assembly;
- (iii) The Mission, Vision, and Values of the Company, which are the following:

Mission: To serve with pride and dedication, becoming essential to our Customers;

Vision: To be the benchmark in the indoor services market in Brazil, respected for offering innovative solutions, delivering quality and providing the best cost-benefit ratio to our Customers.

Values:

- Spirit of Service
- Teamwork
- Discipline
- Self-development
- Commitment
- Entrepreneurship

- (iv) The Code of Ethics and Conduct and in the following Company Policies:

- Material Act or Fact Disclosure Policy
- Securities Trading Policy
- Related-Party Transactions Policy
- Risk Management Policy
- Remuneration Policy
- Appointment Policy of Members of the Board of Directors, its Committees and Statutory Executive Board
- Quality, Safety, Health and Environment Policy
- Privacy and Personal Data Protection Policy

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4 Pillars of the Company's Sustainability Policy

Based on standards for best practices related to Environment, Social Responsibility and Governance, the Company has defined the following pillars of sustainability within its business activities:

Management: We drive, monitor and encourage business models according to the needs of our Customers and on the interest of other stakeholders.

Innovation: We consistently invest in technology, re-evaluate processes, implement new policies and develop our people.

Quality: We monitor Quality, Safety, Health and Environment indicators.

Training: We continuously invest in training, incentives, and professional capacity training programs.

Partnerships: We utilize the Customer Follow-up Report (RAC) and Net Promoter Score (NPS) as management tools to measure customer satisfaction.

5 Mechanisms

The principles of its actions in relation to individuals, entities, and to fulfill environmental, social, and governance objectives are applied through the following mechanisms:

Customers and Suppliers, through the Code of Ethics and Conduct and the Policies of: a) Privacy and Personal Data Protection; b) Quality, Safety, Health, and Environment; and c) Risk Management.

Administrators and Employees, through the Code of Ethics and Conduct, the Policies listed in section 3.1 (iv) above, an intensive training and development agenda and through the Audit, People and Organization, and Monitoring Committees.

Environment, through the Code of Ethics and Conduct, the Policies of: a) Quality, Health, Safety, and Environment, and b) Risk Management; by complying with the Technical Standards of the Brazilian Association of Technical Standards (ABNT) related to Environment, and internal Work Instructions applicable to services, such as: a) waste management and disposal; b) water resource management; c) cleaning and maintenance, among others, and by conducting the inventory of greenhouse gas emissions (GHG Inventory) and the mapping of related risks.

Technology Applied in Environmental Impact Mitigation: By implementing integrated management systems developed using production engineering concepts to mitigate environmental impacts in the supply chain and operations of the Company, by using technological resources in service provision to effectively contribute to reduce the consumption of fossil fuels, water resources, and electricity.

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Governmental and Regulatory Bodies: Through adherence to the Code of Ethics and Conduct, compliance with the Brazilian Corporations Law and regulations issued by the Securities and Exchange Commission and/or B3 (Brasil, Bolsa, Balcão) (including, but not limited to, the New Market Regulations), and the Company's Policies listed in section 3.1 (iv) above.

Non-Governmental Organizations: By adhesion to its recommendations, initiatives, and goals, such as the UN Global Compact and the Sustainable Development Goals.

6 Responsibilities

The responsibility for complying with the rules and objectives of this Policy rests jointly with:

- a) The Management of the Company and its controlled companies, composed by the Board of Directors, its Non-Statutory Advisory Committees, and Executive Statutory Management;
- b) its Employees and Service Providers; and
- c) its Suppliers. The Company is also responsible for suggesting adjustments or solutions to its Customers that meet the objectives and priorities of this Policy.

7 Commitments of the Company

Through this Policy, the Company undertakes to:

Maintain and encourage the performance of the Company's multidisciplinary Sustainability Committee, responsible for implementing the standards and objectives outlined in this Policy, composed of professionals who reflect a diverse range of competencies and represent the broad structure of human resources from the Company, including professionals from Operations, Sales, Procurement, Finance and Controlling, Investor Relations, Human Resources, and Training and Development.

By resolution of its Board of Directors and with the aim of streamlining the process of creating, discussing, and approving policies, guidelines, procedures, and work instructions related to this Sustainability Policy, by delegating authority to the Executive Statutory Management for analysis and approval.

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8 Treatment in Case of Violations of this Policy

8.1 Violations of the terms of this Sustainability Policy may result in the application of disciplinary measures outlined in the Code of Ethics and Conduct of the Company.

8.2 The disciplinary measures are: (i) oral or written warning, (ii) suspension, (iii) termination, (iv) dismissal for cause, without prejudice to the adoption of legal measures related to damage compensation and communication to the competent authorities, when applicable. In the case of violations committed by third parties, it may result in termination of the relationship with the Company and the adoption of appropriate legal measures.

9 Monitoring of Non-compliance with the Guidelines of this Policy

9.1 Monitoring of non-compliance with this Policy will be carried out through the Company's Ethics Channel, which is the official means of communication for reporting any non-compliance or suspected non-compliance with the guidelines of this Policy.

9.2 The Ethics Channel can be accessed by calling 0800 049 4200 or through the website <https://www.canaldeetica.com.br/grupogps/>. Access to the Ethics Channel can be made anonymously or not, and any retaliation against individuals who make good-faith reports is strictly prohibited.

10 Process of Amending this Policy

This Sustainability Policy may be amended in the event of changes in applicable laws and regulations to implement necessary adaptations or in case of changes approved by the Board of Directors following a revision process by the Company.

11 References

11.1 GPS Code of Ethics and Conduct -
<https://api.mziq.com/mzfilemanager/v2/d/a35cc248-b835-4157-944e-86f7561fa441/580a6f4d-878f-c239-6b66-eae9ff486c82?origin=1>.

11.2 GPS Privacy and Personal Data Protection Policy -
<https://www.gpssa.com.br/politica-de-privacidade-2/>

11.3 GPS Quality, Safety, Health, and Environment Policy -
<https://www.gpssa.com.br/wp-content/uploads/2022/06/Politica-de-QSSMA.pdf>

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11.4 GPS Material Act or Fact Disclosure Policy-

<https://api.mziq.com/mzfilemanager/v2/d/a35cc248-b835-4157-944e-86f7561fa441/1918f5e8-689b-dac6-0d9e-d1b0e2867bdc?origin=1>

11.5 GPS Policy for Trading Securities Issued by GPS -

<https://api.mziq.com/mzfilemanager/v2/d/a35cc248-b835-4157-944e-86f7561fa441/c958a7a4-2d99-b9b6-cf6d-b7c6ae250791?origin=1>

11.6 GPS Policy for Transactions with Related Parties -

<https://api.mziq.com/mzfilemanager/v2/d/a35cc248-b835-4157-944e-86f7561fa441/57637c44-ff55-c197-b3fe-6ad06ff52c58?origin=1>

11.7 GPS Risk Management Policy -

<https://api.mziq.com/mzfilemanager/v2/d/a35cc248-b835-4157-944e-86f7561fa441/ad5ecb80-9d58-68ea-540f-2fa271866870?origin=1>

11.8 GPS Remuneration Policy -

<https://api.mziq.com/mzfilemanager/v2/d/a35cc248-b835-4157-944e-86f7561fa441/9cc9b7be-cc7e-1dc7-8c88-eea00e3c70f9?origin=1>

11.9 GPS Appointment Policy of Members of the Board of Directors, its Committees, and Executive Statutory Board -

<https://api.mziq.com/mzfilemanager/v2/d/a35cc248-b835-4157-944e-86f7561fa441/4aec3619-a786-d03a-2212-579517ba3921?origin=1>

This Policy is effective from the date of its approval by the Company's Board of Directors and will remain in effect indefinitely.

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