

POLICY FOR DISCLOSURE OF MATERIAL ACT OR FACT OF
NEOGRID PARTICIPAÇÕES S.A.

1. OBJECTIVE

1.1. Objective. The purpose of this Policy is to establish guidelines and procedures to be observed by the Persons Subject to the Policy for the disclosure of the Company's Material Act or Fact, pursuant to CVM Resolution 44, in order to avoid the misuse of Insider Information and ensure equitable treatment of the Company's investors, based on the principles of integrity and equity of information.

1.2. Principles. This Policy adheres to the following basic principles:

- (i) compliance with the legislation and regulations in force;
- (ii) commitment to the best corporate governance practices;
- (iii) transparency and fairness of treatment;
- (iv) provision of complete information to the Company's shareholders and investors;
- (v) guarantee of broad and immediate disclosure of Material Act or Fact;
- (vi) enabling equal access to public information related to the Company to all shareholders and investors;
- (vii) zeal for the confidentiality of an undisclosed Material Act or Fact;
- (viii) collaboration for the stability and development of the Brazilian capital market; and
- (ix) consolidation of good governance practices in the Company.

2. REFERENCES

References. This Policy has the following normative references: (i) the Company's bylaws; (ii) the Brazilian Corporation Law; (iii) CVM Resolution 44; (iv) the Novo Mercado Regulation of B3; and (v) regulation issued by the CVM on the subject.

3. PERSONS SUBJECT TO POLICY

3.1. Persons Subject to Politics. The following persons are required to comply with the rules and guidelines set forth in this Policy ("Persons Subject to the Policy"):

- (i) the Company;
- (ii) the Controlling Shareholders;
- (iii) the Managers and members of the Other Management Bodies;
- (iv) the Relevant Contributors; and
- (v) Suppliers and Service Providers.

3.1.1. The Company, in an act of discretionary management of the Policy, may request that other persons not expressly referred to in item 3.1, but who may be aware of a Material Act or Fact not yet disclosed to the market, enter into the Term of Adhesion and/or confidentiality agreement.

3.1.2. Shareholders who elect members of the Board of Directors or the Fiscal Council, as well as any individual or legal entity, or group of persons, acting jointly or representing the same interest, who carry out Material Negotiations, even if they were not shareholders before, or cease to be shareholders after, the Relevant Negotiations in question, shall be subject to the provisions of item 9, as well as the effects of its non-compliance, without prejudice to the rules provided for in the applicable legal and regulatory rules.

3.2. Term of Adhesion. The persons indicated in sub-items "ii", "iii" and "iv" of the 3.1 shall, at the time of their hiring, election, promotion or transfer, sign a Statement of Adhesion, pursuant to article 17, paragraph 1, of CVM Resolution 44, according to the model contained in the Annex I of this Policy, by which they will also declare to be aware of all the terms of this Policy and will be obliged to comply with them.

3.2.1. The Instrument of Adhesion must remain on file at the Company's headquarters as long as its signatory maintains a relationship with the Company and for at least five (5) years after his/her termination.

3.3. Non-disclosure agreement. As an alternative to the signing of the Term of Adhesion provided for in item 3.2, as a guarantee of compliance with all the terms contained in this Policy, the signing of a confidentiality agreement with the Suppliers and Service Providers will be allowed. In the case of Suppliers and Service Providers who operate in a profession subject to confidentiality and professional secrecy rules, under the terms of the rules applicable to the exercise of the profession, the execution of a contract of confidentiality.

3.4. Spouses, Partners or Dependents. The natural persons indicated in sub-items "ii", "iii" and "iv" of item 3.1 must ensure that the Policy is observed by the respective Spouses, Partners or Dependents.

4. DEFINITIONS

4.1. Definitions. Whenever used in this Policy, the terms listed below, written with capital letters, will have, both in the singular and in the plural, the following meanings:

Controlling Shareholder(s): shareholder or group of shareholders who exercise, directly or indirectly, the Power of Control of the Company, even if they are not bound by a shareholders' agreement.

Managers: members of the Board of Directors and the Board of Executive Officers.

Material Act or Fact: has the meaning assigned to it in the item 5.

B3: B3 S.A. – Brasil, Bolsa, Balcão.

Stock Exchanges: stock exchanges in which the Company's Securities are admitted to trading, in Brazil or abroad.

COE: Structured Operations Certificates.

Relevant Employees: anyone who, by virtue of their position, function or position held in the Company, the Controlling Shareholders, the Affiliates, or the Subsidiaries, is aware, or may become aware, of a Material Act or Fact about the Company's corporate business that has not yet been disclosed to the market, or even related to the Company's quarterly and annual financial statements that have not yet been disclosed to the market.

Affiliates: companies in which the Company has significant influence, under the terms of the Brazilian Corporation Law.

Company: Neogrid Participações S.A.

Spouse, Partner or Dependent: spouses or partners and/or any other dependent included in the annual income tax return.

Subsidiaries: companies in which the Company holds the Power of Control.

CVM: Brazilian Securities and Exchange Commission.

Other Management Bodies: Effective members of the Non-Statutory Executive Board, Fiscal Council, Audit Committee, Advisory Committees of the Board of Directors (statutory or not) and any other bodies with technical or advisory functions, created or that may be created by the Company.

DFP: Standardized Financial Statements Form.

Non-Statutory Officers: those officers who hold high positions in the Company's management, but who do not hold a statutory position.

Suppliers and Service Providers: all individuals or legal entities that have a commercial, professional or trust relationship with the Company, such as independent auditors, consultants, financial institutions, securities analysts, distribution system institutions, advisors, lawyers, accountants, outsourced workers and suppliers who are hired by the Company, its Subsidiaries or Affiliates and who have knowledge, or may become aware of a Material Act or Fact not yet disclosed to the market or related to the Company's quarterly and annual financial statements that have not yet been disclosed to the market.

Insider Information: information related to a Material Act or Fact until it is disclosed to shareholders and investors in general. Privileged information is also considered to be information related to quarterly or annual financial statements not yet disclosed to the market.

ITR: Quarterly Information Form.

Brazilian Corporation Law: means Law No. 6,404, of December 15, 1976, as amended.

Relevant Negotiation: means the business or group of businesses through which the participation of a certain shareholder or group of shareholders, acting jointly or representing the same interest, direct or indirect, 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 capital stock, extending to (i) the acquisition of any rights over the shares and other Securities; (ii) execution of any derivative financial instruments referenced in the Company's shares, even if no provision for physical settlement is provided. The classification of a transaction as a Material Trading shall comply with the criteria established by article 12 of CVM Resolution 44.

Persons Subject to Policy: people identified in the item 3.1.

Power of Control: power effectively used to direct the corporate activities and guide the operation of the Company's bodies, directly or indirectly, in fact or in law, under the terms of the Brazilian Corporation Law.

Policy: means this Policy for Disclosure of Material Act or Fact of the Company.

CVM Resolution 44: means CVM Resolution No. 44, of August 23, 2021, as amended.

Statement of Adhesion: is the document to be signed by the Persons Subject to the Policy, pursuant to article 17, paragraph 1, of CVM Resolution 44, according to the model contained in Exhibit I of the Company's Securities Trading Policy.

Securities: any assets that, by law, are considered securities, issued by the Company or referenced in securities issued by the Company, including shares, debentures, subscription bonuses, receipts and subscription rights, promissory notes issued by the Company, call or put options, any other securities or collective investment contracts and any securities convertible into shares and certificates of deposits issued in the country and abroad. The defined term "Securities" may also cover those referenced in Securities of Subsidiaries, Affiliates or Parent Companies, when expressly mentioned in the terms of the Policy.

5. DEFINITION OF MATERIAL ACT OR FACT

5.1. Material Act or Fact. For the purposes of this Policy, in accordance with the provisions of CVM Resolution 44, 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 may have a significant influence on the following is considered a Material Act or Fact:

- (i) in the price of the Securities issued by the Company or referenced thereto;
- (ii) in the decision of investors to buy, sell or hold the Securities;
- (iii) in the investors' decision to exercise any rights inherent to the condition of holder of Securities issued by the Company or referenced thereto.

5.1.1. Observing the definition contained in the item 5.1, are examples of potentially material act or fact, among others, those provided for in article 2, sole paragraph, of CVM Resolution 44.

For the purposes of this Policy, information about merger, total or partial spin-off, merger, transformation, or any form of corporate reorganization or business combination, change in control of the company, including through the execution, amendment or termination of the shareholders' agreement, is considered Insider Information, from the moment studies or analyses are initiated on the matter. decision to cancel the registration of the publicly-held company or change the environment or trading segment of the shares issued by it, as well as information about the request for judicial or extrajudicial reorganization and bankruptcy made by the company itself, from the moment studies or analyses related to such request are initiated. As for other events not specified in this item, the prohibition on the trading of Securities provided for in this Policy will only be applicable from the moment these events have sufficient materiality to qualify as Insider Information.

5.1.2. In any case, the events related to the Material Act or Fact must have their materiality analyzed in the context of the common activities and the size of the Company and the Affiliates or Subsidiaries, as well as the information previously disclosed and not in the abstract, in order to avoid trivializing the disclosures of Material Acts or Facts to the detriment of the quality of the analysis. by the market, from the Company's perspectives.

6. FORM OF DISCLOSURE OF MATERIAL ACT OR FACT

6.1. Immediate Disclosure. The disclosure of a Material Act or Fact to the CVM, to the Stock Exchanges and to the market in general must be made immediately, by means of a written document, in a clear and precise manner, in a language accessible to the investing public, in accordance with CVM Resolution 44.

6.1.1. The file with the text of the Material Act or Fact must be sent to the CVM through the CVM Information Disclosure System, in the "Material Fact" category.

6.1.2. Whenever a Material Act or Fact is published by any means of communication, including information to the press or at meetings of class entities, investors, analysts or opinion makers, in Brazil or abroad, the Material Act or Fact shall be disclosed and sent previously or simultaneously to the CVM and the Stock Exchanges.

6.2. Dissemination channel. The disclosures of the Company's Material Acts or Facts are made through the news portal as indicated in the Company's Registration Form, pursuant to article 3, paragraph 4, of CVM Resolution 44.

6.3. Dissemination in Portuguese and English. The Company shall disclose the Material Act or Fact simultaneously in Portuguese and English, without prejudice to the use of other languages, pursuant to the applicable regulations or if the Company's Investor Relations Officer deems it necessary. The Company will make the best efforts to avoid potential divergences between the languages, however, in case of divergence of interpretation between Portuguese and the other languages, the information in Portuguese will prevail.

6.4. Disclosure before or after the trading session. The Material Act or Fact shall, preferably, be disclosed after the closing of the Stock Exchange trading session. If disclosure is necessary before the opening of the trading session, the disclosure must be made, whenever possible, 1 (one) hour

before the start, prevailing, in the event of incompatibility of trading hours in markets of different countries, the opening hours of the Brazilian market.

6.5. Disclosure during the trading session. If it is imperative that the disclosure of a Material Act or Fact occurs during trading hours on the Stock Exchanges, the Investor Relations Officer may request the Stock Exchanges, domestic and foreign (as applicable), to suspend the trading of the Securities issued by the Company for the time necessary for the proper dissemination of information about the Material Act or Fact, if appropriate and observing the procedures of the Stock Exchanges.

6.6. Notice to the market and other forms of communication. If the Company deems it appropriate to disclose to the market information that does not qualify as a Material Act or Fact, it may disclose such information in the form of a notice to the market, notice to shareholders or other forms of communication that it deems pertinent.

6.7. Non-immediate disclosure of Material Act or Fact. The Company may, exceptionally, refrain from disclosing Material Act or Fact when the Controlling Shareholder or the Company's Management understand that the disclosure of the Material Act or Fact at that time may jeopardize the Company's legitimate interest. If the Material Act or Fact is linked to transactions directly involving the Controlling Shareholder and the latter decides not to disclose it, the Controlling Shareholder must inform the Company's Investor Relations Officer and/or the Investor Relations Department.

6.7.1. Even if the Controlling Shareholder or the Company's Management decide not to disclose a Material Act or Fact, in the event that the Material Act or Fact kept confidential escapes control or, in the event of an atypical fluctuation in the quotation, price or quantity traded of the Securities issued by the Company or referenced thereto, the Controlling Shareholders or Management are obliged to: through the Investor Relations Officer or directly, to arrange for the Material Act or Fact to be immediately communicated to the CVM, Stock Exchanges and the investing public.

6.7.2. The Company will not comment on existing rumors in the market about it, unless such rumors significantly influence the price of the Securities or if it is questioned by regulatory and self-regulatory bodies.

6.7.3. The Controlling Shareholders or Managers may submit to the CVM the need to provide information that is no longer disclosed in accordance with item 6.6, subject to the provisions of CVM Resolution 44.

7. MECHANISMS FOR CONTROL AND RESTRICTION OF ACCESS TO PRIVILEGED INFORMATION

7.1. Mechanisms for controlling and restricting access to Privileged Information. In order to preserve the confidentiality of Insider Information not yet disclosed to the market, it is recommended that the Persons Subject to the Policy observe the following procedures, without prejudice to the adoption of other measures that may be appropriate in view of each specific situation:

(i) disclose the Insider Information strictly to persons directly involved with the matter in question;

- (ii) not to discuss the Inside Information (a) in public places or in the presence of third parties who are not aware of it, or (b) in telephone conferences in which it is not possible to be sure who the persons who may participate in it actually are;
- (iii) to keep secure the medium in which Insider Information is stored and transmitted, restricting any unauthorized access; and
- (iv) not to share such Insider Information with any third party, including Spouses, Partners or Dependents.

8. ASSISTANCE TO INVESTORS AND ANALYSTS

8.1. Assistance to investors and analysts. Assistance to investors and market analysts will always be provided by the Investor Relations Officer and/or by a representative of the Investor Relations Department, and such persons may be accompanied by other Management and employees of the Company, at the discretion of the Investor Relations Officer.

9. DISCLOSURE ON ACQUISITION OR SALE OF MATERIAL INTEREST

9.1. Communication on Relevant Negotiations. The Controlling Shareholders, shareholders who elect members of the Board of Directors or the Fiscal Council, as well as any natural or legal person, or group of persons, acting jointly or representing the same interest, who carry out Material Trades shall send to the Investor Relations Officer, immediately after the transaction, a notice covering all the information required by Article 12, *caput* and subparagraphs, of CVM Resolution 44.

9.2. Disclosure of Information on Material Trades. The Investor Relations Officer, through the Company's Investor Relations area, is responsible for transmitting the information related to the Relevant Trades, as soon as they are received, to the CVM and the Stock Exchanges.

9.3. Rules applicable to relevant negotiations. In the Relevant Negotiations, the following rules must be observed, without prejudice to the other provisions of this Policy and the applicable regulations:

- (i) the shares directly held and those referenced by physical settlement derivative financial instruments will be considered together for the purposes of verifying the percentages of the Relevant Trades;
- (ii) the shares referenced by derivative financial instruments with an exclusively financial settlement forecast will be computed regardless of the shares referred to in sub-item "i" above for the purpose of verifying the percentages of Relevant Trades; and
- (iii) The number of shares referenced in derivative instruments that confer economic exposure to the shares cannot be offset against the number of shares referenced in derivative instruments that produce inverse economic effects.

9.3.1. The obligations provided for in item 9.3 do not extend to COEs, securities index funds and other derivative financial instruments in which less than twenty percent (20%) of their return is determined by the return on the shares issued by the Company.

9.4. Relevant Negotiations that have as their objective or result the change in the Company's control or administrative structure or generate the obligation to carry out a public offering. In cases where the Relevant Negotiation results or has been carried out with the purpose of changing the composition of the Company's control or administrative structure, as well as in cases in which the Relevant Negotiation generates an obligation to carry out a public offering, under the terms of the applicable regulations, the acquirer shall also promote the disclosure of a notice containing the information provided for in items I to V of the *caput* of Article 12 of CVM Resolution 44, at least, through the same communication channel usually adopted by the Company, as indicated in this Policy.

10. PUBLIC OFFERING

10.1. Public Offering of Distribution. In the event of a public offering for the distribution of the Company's Securities, decided or projected, the Persons Subject to the Policy shall, without prejudice to other obligations provided for in the regulations issued by the CVM and the disclosure by the Company of periodic and occasional information required by the CVM:

- (i) until the public offering is disclosed to the market, limit: **(a)** the disclosure of information related to the offer to what is necessary for the purposes of the offer, warning the recipients about the confidential nature of the information transmitted; and **(b)** the use of the reserved information strictly for purposes related to the preparation of the offer;
- (ii) from **(a)** the moment the offer is approved by a deliberative act, or if there is no deliberative act, the moment of engagement or hiring of the lead coordinator of the offer, or **(b)** from the thirty (30) days prior to the filing of the request for registration of the offer, which shall be considered the first date between (a) and (b), refrain from expressing itself in the media about the offer or the Company until the disclosure of the announcement of the end of distribution; and
- (iii) from the moment the offer becomes public, by disclosing information related to the Company or the offer: **(a)** observe the principles related to quality, transparency and equal access to information; and **(b)** clarify its connections with the Company or its interest in the offer, in its manifestations in matters involving the offer, the Company or its Securities.

10.2. Permitted Disclosures. The prohibition provided for in sub-item "ii" of the 10.1 Not applicable to **(i)** periodic and occasional disclosure of information required from the Company by the CVM, the Stock Exchanges or other competent regulatory or self-regulatory authority, which must be carried out within the deadlines established by the applicable laws and regulations; **(ii)** information usually disclosed in the normal course of the Company's activities, provided that it is carried out in a manner consistent with the prior disclosures; and **(iii)** information related to advertising promotion campaigns, media manifestations or journalistic publications about the products and services offered by the Company, as long as it does not mention a public offering of securities.

10.2.1. If the Company promotes events or acts of communication on the occasion of the disclosure of results, including collective or individual interviews with the press, conference calls with analysts, publication of reports and advertising documents, meetings with investors and disclosure of projections, each and every event or act of communication must be accompanied by a notice, alerting the public to:

- (i) the existence of a public offering of distribution in progress or in the process of being carried out, if the operation has already been disclosed to the market and within the limits of what was disclosed; and
- (ii) the need for any interested person to carefully read the prospectus disclosed or to be disclosed, especially the section on risk factors, before making any decision with respect to the offering.

10.3. Additional Obligations. The Company and the Persons Subject to the Policy shall also comply with (i) the rules of conduct established by the local legal advisor in the context of public offerings for the distribution of Securities, including CVM Resolution No. 160, of July 13, 2022, as amended; and (ii) the rules of foreign law regarding prohibitions and other limitations on disclosure of information in the context of a public offering of Securities Company's Securities, according to the guidelines of a legal advisor in foreign law, whenever applicable.

11. DISCLOSURE OF QUARTERLY AND ANNUAL RESULTS

11.1. Disclosure of results. The information related to the quarterly and annual results will be: (i) filed with the CVM and Stock Exchanges, as applicable, (ii) made available on the Company's website; and, subsequently, (iii) made available to analysts and investors who are part of the Company's register.

11.2. Disclosure outside trading hours. The disclosure of the Company's quarterly and annual results will be made outside the trading hours of the Stock Exchanges of the markets in which the Company's Securities are admitted to trading.

11.3. Public presentation. The Company shall hold, within five (5) business days after the disclosure of the quarterly and annual results, a public presentation on the information disclosed with analysts and investors, pursuant to the applicable regulations, and may also, at its discretion, hold press conferences with the specialized press, in order to provide ample knowledge about the Company's quarterly and annual results.

11.4. Dates of displacement. The Company will inform the market through its annual calendar of the date of disclosure of ITRs and DFPs.

11.5. Other Privileged Information. Inside Information that does not directly relate to the content of financial information not yet disclosed shall continue to be disclosed to the market in accordance with this Policy.

12. PROJECTIONS

12.1. Disclosure of projections. The disclosure of projections is information of a material nature, subject to the provisions of CVM Resolution 44. The disclosure of projections is optional, under the terms of CVM regulations and, when the Company decides to disclose them, they must be: (i) included in the Reference Form; (ii) identified as hypothetical data that does not constitute a promise of performance; (iii) reasonable; and (iv) be accompanied by the relevant assumptions, parameters

and methodology adopted, and if these are modified, the Company shall disclose, in the appropriate field of the Reference Form, that it has made changes to the relevant assumptions, parameters and methodology of projections and estimates previously disclosed.

12.2. Review of projections. If disclosed, the projections shall be reviewed periodically, in a time interval appropriate to the object of the projection, which, under no circumstances, shall exceed one (1) year. The Company shall also compare, on a quarterly basis, in the appropriate field of the ITRs and DFPs, the projections disclosed in the Reference Form with the results actually obtained in the quarter, indicating the reasons for any differences.

12.3. Indication of sources. Whenever the assumptions of projections are provided by a third party, the sources must be indicated.

12.4. Caveats. The projections must always be accompanied by the usual caveats informing that these are forecasts subject to risks and uncertainties, having been made based on expectations and assumptions of the Company's management, in accordance with the information available in the market at that time.

12.5. Discontinuation of projections. If the projections disclosed are discontinued by the Company, this fact must be informed in the appropriate field of the Reference Form, accompanied by the reasons that led to its loss of validity, as well as disclosed in the form of a Material Fact.

13. RESPONSIBILITIES

13.1. Persons Subject to Politics. It is the duty of the Persons Subject to the Policy, in addition to the other obligations provided for in this Policy and in the applicable legislation and regulation:

- (i) know, have access to and understand this Policy, as well as have full knowledge of their respective obligations in relation to its application;
- (ii) maintain confidentiality about information related to Material Act or Fact of the Company to which they have access due to the position or position they hold, until its disclosure to the market, and the use of such information for the purpose of obtaining an advantage, for oneself or for others, is strictly prohibited, subject to the application of the penalties provided for in this Policy and in the applicable laws and regulations;
- (iii) ensure that their subordinates keep confidential information related to a Material Act or Fact and do not use it;
- (iv) ensure that third parties of its trust keep confidential information related to a Material Act or Fact and do not use it, being jointly and severally liable with them in the event of non-compliance, even if they have not concurred with the infraction;
- (v) communicate to the Investor Relations Officer and/or the Investor Relations Department any information that they deem to characterize a Material Act or Fact, which will be responsible for deciding on the need to disclose the matter to the market and on the level of detail of the disclosure; and

(vi) promptly respond to requests for clarification made by the Investor Relations Officer regarding the verification of the occurrence of a Material Act or Fact.

13.1.1. The duty to maintain confidentiality, provided for in sub-item "ii" of item 13.1 it also applies to former Managers and former members of the Other Management Bodies who have left the Company before the public disclosure of certain Insider Information in relation to the Company's business of which they are aware. The duty to maintain confidentiality will extend until the disclosure, by the Company, of the Material Act or Fact to the market.

13.2. Investor Relations Officer. It is the duty of the Investor Relations Officer, in addition to the other obligations set forth in this Policy:

(i) disclose Material Act or Fact, subject to the provisions of this Policy and CVM Resolution 44;

(ii) send to the CVM, through an electronic system available on the CVM website on the world wide web and, if applicable, to the Stock Exchanges, any Material Act or Fact that occurred or related to the Company's business;

(iii) ensure the wide and immediate dissemination of the Material Act or Fact disclosed or communicated, simultaneously in all markets in which such Securities are admitted to trading;

(iv) cause the disclosure of a Material Act or Fact to precede or be made simultaneously with the disclosure of the information by any means of communication, including information to the press, or at meetings of class entities, investors, analysts or with a selected public, in the country or abroad;

(v) to inquire the persons with access to Material Act or Fact, in order to ascertain whether they are aware of information that must be disclosed to the market, in the event of an atypical fluctuation in the quotation, price or quantity traded of the Securities, or in case of need to provide additional clarifications to the CVM or the Stock Exchanges;

(vi) immediately disclose a Material Act or Fact that has, exceptionally, not been disclosed because the Controlling Shareholders or Management understand that its disclosure would jeopardize the Company's legitimate interest, in the event that the information escapes control or if there is an atypical fluctuation in the quotation, price or quantity of the Securities;

(vii) provide the requested information, in case the CVM or the Stock Exchanges require clarification on the communication and disclosure of Material Act or Fact;

(viii) analyze any rumors or speculations about the Company and assess whether an official communication from the Company to the market is necessary;

(ix) once it is found that there is a news item in the press involving Insider Information or the publication of news that adds a new fact about information that has already been disclosed, analyze the potential impact of the news on the negotiations and, if applicable, immediately express an opinion on such news, under the terms of the applicable regulations;

- (x) to manage this Policy, as well as to transmit to the CVM and/or the Stock Exchange or to the entities of the organized over-the-counter market in which the Company's Securities are admitted to trading the information received in accordance with this Policy, as required under the terms of the applicable regulations;
- (xi) transmit to the CVM and, if applicable, to the Stock Exchanges or to the entities of the organized over-the-counter market in which the Company's shares are admitted to trading, the information related to the reporting of ownership and trades carried out with Securities of the Company, its Parent Companies and Subsidiaries, provided to the Company under the terms of the Company's Securities Trading Policy; and
- (xii) transmit the information on Material Trading, as soon as it is received by the Company, to the CVM and, if applicable, to the entities managing the markets in which the Company's shares are admitted to trading.

13.3. Controlling Shareholders, Managers and Members of Other Management Bodies. Without prejudice to the provisions of item 13.1, it is incumbent upon the Controlling Shareholders, the Managers and the members of the Other Management Bodies:

- (i) immediately communicate to the CVM and, if applicable, to the Stock Exchanges any Material Act or Fact of which they are aware, if they find the omission of the Investor Relations Officer in the fulfillment of his duty of communication and disclosure; and
- (ii) inform the Investor Relations Officer in advance of the content of any interview or press statement involving the Company that may be configured as a Material Act or Fact.

13.3.1. If any Manager or member of the Other Management Bodies intends to comment in the media, by any means of communication, including the internet or social networks, any information to which he has obtained access and has doubts about its qualification as Insider Information, the Investor Relations Officer must be previously notified so that he can assess whether the information constitutes a Material Act or Fact and must be simultaneously disclosed to the market.

13.4. Investor Relations Department. It is the duty of the Investor Relations Department, in addition to the other obligations set forth in this Policy:

- (i) identify Relevant Employees and Suppliers and Service Providers who must formally adhere to the Policy;
- (ii) formally communicate the terms of this Policy to the Persons Subject to the Policy, obtaining the respective formal adhesion by signing the Instrument of Adhesion, as applicable, which shall be filed at the Company's headquarters for as long as the person maintains a relationship with it, and for at least five (5) years after his/her termination;
- (iii) maintain at the Company's headquarters, at the disposal of the CVM, a list with an updated list of Persons Subject to the Policy, as well as those persons who violate this Policy, and their respective qualifications, indicating position or function, address and registration number in the National Registry of Legal Entities or in the Registry of Individuals;

- (iv) report to the Company's Ethics Committee and/or Board of Directors the cases identified as violations of the Policy; and
- (v) advise the Investor Relations Officer in compliance with this Policy.

13.4.1. The Investor Relations Department, under the supervision of the Investor Relations Officer, is authorized to disclose Material Act or Fact.

13.5. People & Management Department. It is the duty of the People & Management Department, in addition to the other obligations set forth in this Policy, to assist the Investor Relations Department, providing for the signatures of the Terms of Adhesion of the Relevant Employees and Suppliers and Service Providers, as well as other persons not expressly referred to in item 3.1 and that they must adhere to this Policy, and forward them to the Investor Relations Department, which will be responsible for filing and controlling such adhesions, keeping them on file for at least five (5) years from the termination of each Person Subject to the Policy.

13.6. Managers, members of the Other Management Bodies and Relevant Employees. It is the duty of all Managers, members of the Other Management Bodies and Relevant Employees, in addition to the other obligations set forth in this Policy:

- (i) sign the Statement of Adhesion and forward it to the Investor Relations Department for proper filing;
- (ii) arrange for the signature of the Term of Adhesion, or confidentiality agreement, by any persons that it identifies as Suppliers and Service Providers, and deliver said Term of Adhesion to the Investor Relations Department for filing; and
- (iii) not to grant an interview or statement to the press involving a Material Act or Fact of the Company, without being previously authorized to do so by the Investor Relations Officer.

13.7. Ethics Committee. It is incumbent upon the Company's Ethics Committee to analyze and determine the referral of cases of violation of this Policy and CVM Resolution 44 to the Audit Committee, as the case may be, for knowledge, evaluation and possible imposition of sanctions.

13.8. Audit Committee. The Company's Audit Committee is responsible for evaluating any violations of this Policy and CVM Resolution 44, as well as determining the sanctions to be applied, in compliance with the Code of Ethics and Conduct and other policies of the Company.

13.9. Board of Directors. It is the duty of the Board of Directors to supervise the application of this Policy, evaluate and approve any changes to this Policy, as well as to resolve on any situations not provided for in this Policy, in addition to the other obligations provided for in this Policy.

14. POLICY VIOLATION

14.1. Effects of the violation. Violation of this Policy and/or CVM Resolution 44 subjects the violator to disciplinary sanctions, in accordance with the Company's internal rules, such as guidance, warning, suspension or dismissal for cause, according to the seriousness of the violation, without prejudice to the applicable administrative, civil and criminal sanctions.

14.2. Audit Committee. Sanctions for non-compliance with this Policy and/or CVM Resolution 44 shall be evaluated and applied by resolution of the Company's Audit Committee, in compliance with the Code of Ethics and Conduct and other policies of the Company.

14.3. Defaults by Supplier or Service Provider. The violation committed by any Supplier or Service Provider characterizes a breach of contract, and the Company may, without any burden, terminate the respective contract and demand the payment of the fine established therein, without prejudice to the compensation of losses and damages and other consequences provided for in this Policy and in the applicable legal and regulatory rules.

14.4. Reporting of violations. Any person who becomes aware of a violation of this Policy must immediately report the fact to the Investor Relations Officer or the Company's ombudsman, through the contact channels made available by the Company, so that the necessary measures can be taken.

15. APPROVAL

15.1. Approval. This Policy was approved by the Company's Board of Directors at a meeting held on February 27, 2025 and entered into force as of that date, for an indefinite period, and replaces any other provision on the subject previously approved.

15.2. Amendments. The Company's Board of Directors is the Company's body that has exclusive competence to approve any amendment to this Policy.

15.2.1. Any change to this Policy shall be communicated by the Investor Relations Officer to the CVM and to the Stock Exchanges and to the organized over-the-counter market entity in which the Company's Securities are admitted to trading, and the communication shall be accompanied by a copy of the resolution and the entire content of the changes to this Policy.

15.2.2. Persons Subject to the Policy will be formally notified of any changes or revisions to the Policy.

15.2.3. The revision or amendment of this Policy may not be approved pending a Material Act or Fact not yet disclosed to the market.

16. ATTACHMENTS

Annex I – Term of Adhesion.

* * *

ANNEX I

TERM OF ADHESION – INDIVIDUAL

By this Term of Adhesion, [name], [qualification], resident and domiciled at [address], registered with the CPF under No. [==] and bearer of Identity Card No. [==] [issuing agency] ("Adherent"), as [position, function or relationship with the Company] of **NEOGRID PARTICIPAÇÕES S.A.**, a corporation headquartered in the City of Joinville, State of Santa Catarina, Avenida Santos Dumont, No. 935, 1st floor, Bairro Santo Antonio, CEP 89.218-105, registered with the CNPJ under No. 10.139.870/0001-08, with its corporate documents duly filed with the Board of Trade of the State of Santa Catarina under NIRE 42300036510 ("Company"), hereby adheres, fully and unrestrictedly, to the Company's Securities Trading Policy and to the Company's Material Act or Fact Disclosure Policy ("Policies"), declaring to have received a complete copy of the Policies and to be fully aware of the rules contained therein, as well as the provisions of the applicable legislation and regulations, committing to fully comply with all its terms and conditions as applicable.

The adhesion of the Adherent to the Policies is irrevocable and irreversible, binding on its successors and assigns, in any capacity.

This term will be filed at the Company's headquarters.

[Place and Date]

[Name of Member]

Witnesses:

Name:
RG:
CPF:

Name:
RG:
CPF:

ANNEX I

TERM OF ADHESION – LEGAL ENTITY

By this Term of Adhesion, [name], [qualification], with headquarters at [address], registered with the CNPJ under No. [==] and with its corporate documents duly filed with the State Board of Trade [==] under NIRE [==], hereby represented in the form of its [Bylaws / Articles of Association] ("Adherent"), as [relationship with the Company] of **NEOGRID PARTICIPAÇÕES S.A.**, a corporation headquartered in the City of Joinville, State of Santa Catarina, Avenida Santos Dumont, n.º 935, 1º andar, Bairro Santo Antonio, CEP 89.218-105, registered with the CNPJ under No. 10.139.870/0001-08, with its corporate documents duly filed with the Board of Trade of the State of Santa Catarina under NIRE 42300036510 ("Company"), hereby adheres, fully and unrestrictedly, to the Company's Securities Trading Policy and to the Company's Material Act or Fact Disclosure Policy ("Policies"), declaring to have received a complete copy of the Policies and to be fully aware of the rules contained therein, as well as the provisions of the applicable legislation and regulations, committing to fully comply with all its terms and conditions as applicable.

The adhesion of the Adherent to the Policies is irrevocable and irreversible, binding on its successors and assigns, in any capacity.

This term will be filed at the Company's headquarters.

[Place and Date]

[Name of Adherent and his/her representative]

Witnesses:

Name:

IDENTIF
ICATIO
N:
CPF:

Name:

IDENTIF
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N:
CPF: