

**POLICY FOR THE DISCLOSURE OF MATERIAL ACT OR FACT AND TRADING OF
SECURITIES ISSUED BY UNIGEL PARTICIPAÇÕES S.A.**

1. PURPOSE

1.1. The purpose of this “*Policy for the Disclosure of Material Act or Fact and for the Trading of Securities Issued by Unigel Participações S.A.*” is to discipline the internal procedures to be adopted in order to fully comply with the legal and regulatory provisions concerning the disclosure of material act or fact, as well as establishing rules to ensure the compliance with good conduct practices in the trading of Securities (as defined below) issued by the Company, as well as avoiding the inappropriate use of any Insider Information (as defined below), in the terms of CVM Resolution 44 (as defined below).

2. DEFINITIONS

2.1. The terms and expressions listed below, when used in this Policy, will have the following meanings:

2.1.1. “**Controlling Shareholder**”: The shareholder or group of shareholders bound by a shareholders’ agreement or under common control exercising the power of direct or indirect control of the Company, pursuant to Law No. 6.404, of December 15, 1976, as amended.

2.1.2. “**Administrators**”: Members of the Company’s Board of Directors and Executive Board.

2.1.3. “**Associates with Access to Insider Information**”: As identified by the Chief Investor Relations Officer (i) whoever, by virtue of their position, duties or position in the Company, its controlling or controlled companies or affiliates, may become aware of information relating to a Material Act or Fact, including employees, interns and other staff members, and (ii) third parties who, by virtue of a business, professional or trustworthy relationship with the company, may become aware of information relating to a Material Act or Fact, such as independent auditors, securities analysts, consultants and institutions that are part of the distribution system.

2.1.4. “**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 occurred or related to the business of the Company, which can significantly influence: (a) in the quotation of the Company’s Securities; (b) in investors’ decision to buy, sell or hold those Securities; or (c) in the decision of investors to exercise any rights inherent to the condition of holder of Securities, which may potentially include, without limitation, the examples of potentially material acts or facts contained in article 2 of CVM Resolution 44.

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

2.1.6. **“Code of Ethics”**: The *“Code of Ethics”* applicable to the companies of the Company’s economic group, whose adoption was approved at the Company’s Board of Directors Meeting.

2.1.7. **“Company”**: Unigel Participações S.A.

2.1.8. **“CVM”**: The Brazilian Securities Commission (*Comissão de Valores Mobiliários*).

2.1.9. **“FSs”**: The Company’s annual financial statements.

2.1.10. **“Responsible Officer”**: The Chief Investor Relations Officer elected to perform the duties provided for in CVM rules, including the enforcement, monitoring and inspection of this Policy, pursuant to the Company’s Articles of Incorporation.

2.1.11. **“Executive Board”**: The Company’s executive board.

2.1.12. **“Market Entities”**: Group of entities managing the markets in which the securities issued by the Company are or will be admitted to trading, as well as equivalent entities in other countries.

2.1.13. **“Insider Information”**: Any and all Material Acts or Facts that have not yet been disclosed to the investing public.

2.1.14. **“QFI”**: The Company’s quarterly financial information.

2.1.15. **“Relevant Trading”**: The business or set of businesses through which the direct or indirect participation of: **(i)** the direct or indirect Controlling Shareholder; and/or **(ii)** of the shareholders who elect members of the Board of Directors or the Fiscal Committee; and/or **(iii)** from any natural person or legal entity; and/or **(iv)** the group of people, acting together or representing the same interest, exceeds, up or down, the thresholds of five percent (5%), ten percent (10%), fifteen percent (15%), and so on, of the type or class of shares representing the Company’s capital stock.

2.1.16. **“Period of Impediment to Trading”**: Any and all periods in which there is an impediment to trading in Securities by regulatory determination or by the Responsible Officer, including the periods provided for in items 10.2, 10.4, 10.5, 10.6 and 10.7 of this Policy.

2.1.17. **“Connected Persons”**: Persons who maintain the following links with Related Persons: **(i)** Spouse, from whom they are not legally separated; **(ii)** romantic partner; **(iii)** any dependent included in the individual’s annual income tax return; **(iv)** children, siblings (1st-degree relatives); and **(v)** companies directly or indirectly controlled by Related Persons.

2.1.18. **“Related Persons”**: The direct and indirect Controlling Shareholder(s), the Administrators, the members of the Fiscal Committee, when convened, the members of any bodies of the Company with technical or advisory duties, created by statutory provision, or Associates with Access to Insider Information.

2.1.19. **“Plan”**: The Individual Investment Plan or Individual Divestment Plan approved by the Company that can be contracted by anyone who has a relationship with the Company that makes them potentially subject to the assumptions referred to in item 10.2.1 below, disciplining the trading of Securities issued by the Company, or referenced to them, under the terms of the Section 11 of this Policy.

2.1.20. **“Policy”**: This Policy for the Disclosure of Material Act or Fact and the Trading of Securities Issued by the Company.

2.1.21. **“CVM Resolution 44”**: CVM Resolution No. 44, of August 23, 2021.

2.1.22. **“Controlled Companies”**: Companies in which the Company owns directly or indirectly partners'/stockholders' rights that permanently ensure preponderance in the decision-making process and the power to elect the majority of management.

2.1.23. **“Adhesion Term”**: Term of adhesion to this Policy, to be signed in accordance with the template in **Annex I** of this Policy.

2.1.24. **“Securities”**: Any shares, convertible or non-convertible debentures, certificates of real estate receivables, subscription warrant, receipts and subscription rights, promissory notes, call or put options or derivatives of any kind, or any other securities or collective investment contracts issued by the Company or referenced to them that, by legal determination, are considered a “*security*”.

3. PRINCIPLES OF DISCLOSURE

3.1. This Policy is based on the following principles and goals:

- (i) compliance with specific legislation, CVM regulation and other national and foreign regulatory bodies to which the Company may be subject;
- (ii) provide complete information to the Company's shareholders and investors;
- (iii) ensure wide and immediate disclosure of the Material Act or Fact;
- (iv) provide transparency and equal access to public information about the Company to every shareholder and investor;
- (v) ensure that the disclosure of information about the Company's equity and financial situation is correct, complete and continuous, as provided for in this Policy and in the regulation in force;
- (vi) ensure the availability of information to the market that may influence their investment decisions;
- (vii) ensure the confidentiality of undisclosed Material Acts or Facts;
- (viii) cooperate for the stability and development of the Brazilian capital market; and
- (ix) consolidate good corporate governance practices in the Company, adhering to the best investor relations practices.

4. DISCLOSURE PROCEDURES

4.1. The disclosure and communication to CVM and the Market Entities of a Material Act or Fact, through the Company's institutional communication channels, as well as the adoption of the other procedures set forth herein, is an obligation of the Responsible Officer.

4.1.1. The Material Act or Fact must be:

- (a) disclosed through a news portal with a page on the world wide web that makes available, in a section available for free access, the information in its entirety; and
- (b) available (i) on the page of CVM's periodic and occasional information submission system (Sistema Empresas.Net); and (ii) on the Company's Investor Relations website (<http://invest.unigel.com.br/>) in a content at least identical to that sent to CVM.

4.1.2. The information contained in the Material Act or Fact must be presented in a clear and precise manner, in objective language and accessible to the investing public. Whenever any technical concept is used that, at the discretion of the Responsible Officer, is considered to be of greater complexity, an explanation of its meaning must be included in the information disclosed.

4.2. In the event of disclosure of a Material Act or Fact by any means of communication, including information to the press, or at meetings of trade associations, investors, analysts or with a selected public, in the country or abroad, the Responsible Officer shall disclose, beforehand or simultaneously, the respective information to the market, as set out herein.

4.3. The Related Persons will be responsible for communicating to the Responsible Officer any and all Material Acts or Facts of which they are aware and which they assume have not yet come to the attention of the Responsible Officer, who will disclose them, pursuant to this Policy.

4.3.1. The persons referred to in item 4.3 of this Policy must verify that the Responsible Officer has taken the measures prescribed in this Policy in relation to the disclosure of the respective information.

4.3.2. The communication to the Responsible Officer referred to in item 4.3 above must be made by e-mail, to the address: ri@unigel.com.br.

4.3.3. If the persons mentioned in item 4.3 verify the Responsible Officer's omission in the fulfillment of their duty of communication and disclosure, including in the event of item 5.2 below, such persons shall immediately communicate the Material Act or Fact to CVM, pursuant to CVM Resolution 44.

4.4. Whenever the CVM or the Market Entities require from the Responsible Officer additional clarifications to the communication and disclosure of a Material Act or Fact, or if there is an atypical fluctuation in the quotation, price or quantity traded of the Securities, the Responsible Officer shall inquire people with access to Material Acts or Facts, in order to ascertain whether

they are aware of information that should be disclosed to the market.

4.4.1. Persons questioned pursuant to this item 4.4 must respond to the request of the Responsible Officer immediately. If they are unable to meet in person or speak by telephone with the Responsible Officer on the same day that they became aware of the respective requirement of the CVM or of the Market Entities, the persons in question must send an email with the relevant information to ri@unigel.com.br.

4.5. The disclosure of a Material Act or Fact must be made simultaneously to the CVM and to the Market Entities, preferably after the closing of business in the markets where the Securities are traded, both in Brazilian and foreign Market Entities.

4.5.1. If disclosure is required before the start of trading, such disclosure must occur, whenever possible, at least one (1) hour before the opening of the trading session.

4.5.2. In any event of incompatibility, the hours of operation of the Brazilian market will prevail.

4.5.3. If the disclosure of a Material Act or Fact must take place during trading hours, the Responsible Officer shall always simultaneously request to the Brazilian and foreign Market Entities the suspension of trading of the Securities, for the time necessary for the proper dissemination of the respective information, subject to the procedures provided for in the regulations issued by the Market Entities on the matter.

4.6. The Responsible Officer shall establish and disclose to the market, in advance as compatible with market standards and in accordance with applicable regulations, especially article 29 of the Novo Mercado Regulation, the dates on which the duly audited quarterly, semiannual or annual results of the Company will be disclosed.

4.7. The Company may disclose to the market its expectations of future performance (guidance), both in the short and long term, especially with regard to the financial and operational aspects of its business, by decision of the Board of Directors, noting, however, that the disclosure of such expectations gives rise to the restriction of trading set out in article 14 of CVM Resolution 44.

4.7.1. In the event of disclosure of such expectations, without prejudice to the applicable regulations, the following must be observed:

- (i) such estimates must be reasonable and be accompanied by relevant assumptions, parameters and methodology adopted, as well as identified as hypothetical data that do not constitute a promise of performance;
- (ii) the results or information prepared in accordance with foreign accounting standards must present the reconciliation to Brazilian accounting practices, as well as the reconciliation with the accounting items expressed directly in the Company's financial statements and, therefore, obtained by the accounting criteria adopted in Brazil;
- (iii) if the data presented is from a third party, the respective source must be

presented;

(iv) if the information disclosed involves the preparation of projections, a comparison with the results actually obtained must be presented at the time of the disclosure of the Quarterly Information Form (QFI) and the Standardized Financial Statements Form (SFS) of the Company;

(v) the projections and estimates disclosed must be included in the Company's reference form; and

(vi) if the disclosed projections are discontinued, this fact must be informed, together with the reasons that led to its loss of validity, in the form of a Material Act or Fact.

4.7.2. Without prejudice to the possibility of disclosing projections and estimates, pursuant to Clause 4.7.1, the anticipated disclosure of results may also be exceptionally allowed, in the case of preliminary information, not yet audited, being clearly presented, for each of the projected items and periods, noted that:

- (i) this exceptional disclosure must, as a rule, be made through a Material Fact; and
- (ii) the period of prohibition of trading provided for in article 14 of CVM Resolution 44 is also anticipated, and the other applicable provisions of this Policy must be observed.

5. EXCEPTION TO DISCLOSURE

5.1. Material Acts or Facts may exceptionally not be disclosed if the Controlling Shareholder or the Company's management understand that their disclosure will jeopardize the Company's legitimate interest, and the procedures established in this Policy must be mandatorily adopted in order to ensure confidentiality of such information.

5.2. Notwithstanding item 5.1 above, the Responsible Officer shall immediately disclose the Material Act or Fact kept confidential if the relevant information becomes partially or totally known, or if there is atypical fluctuation in the quotation, price or quantity traded of the securities issued by the Company or referenced to them, or even in the event that CVM or Market Entities decide for its disclosure.

5.3. The Controlling Shareholder or the administrators shall request the Responsible Officer to immediately disclose the Material Act or Fact kept confidential, in any of the cases mentioned in item 5.2 above.

5.3.1. If the Responsible Officer does not take the necessary measures for the immediate disclosure referred to in this item 5.3, it will be up to the Controlling Shareholder or to the administrators, as applicable, to adopt such measures.

5.4. The Responsible Officer must always be informed of a Material Act or Fact kept

confidential, and it is their responsibility, together with the other persons who know this information, to ensure the adoption of the appropriate procedures to maintain confidentiality.

5.5. Whenever there is, on the part of those who are aware of a Material Act or Fact kept confidential, doubt as to the legitimacy of not disclosing the information, the matter must be submitted to CVM, as provided for in the applicable rules.

6. PROCEDURES FOR PRESERVING CONFIDENTIALITY

6.1. The Controlling Shareholder, the officers, the members of the Board of Directors, the fiscal committee and any bodies with technical or advisory duties, created by statutory provision, when convened, in addition to the other Company employees and agents, must preserve the secrecy of confidential information relevant to Material Acts or Facts to which they have privileged access due to their position or status, not using this information to obtain advantage for themselves or others, always respecting the procedures established in this Section 6, until its effective disclosure to the market, as well as ensuring that subordinates and third parties they trust also do so, being jointly and severally liable with them in the event of non-compliance.

6.1.1. For the purposes of this Policy, the third parties mentioned in item 6.1 above include any persons who may know information relating to Material Acts or Facts, such as consultants, independent auditors and advisors.

6.1.2. The person subject to the duty of confidentiality who leaves the Company, or who ceases to participate in the business or project to which the Material Acts or Facts refer will remain subject to confidentiality until such information is disclosed to the market and to the competent bodies.

6.2. For the purpose of preserving the confidentiality referred to in item 6.1 above, the persons mentioned therein shall observe and ensure compliance with the following procedures, without prejudice to the adoption of other measures that are appropriate in each specific situation:

- (i) disclose confidential information strictly to those people who need to know about it;
- (ii) do not discuss confidential information in the presence of third parties who are not aware of it, even though it can be expected that said third party cannot infer the meaning of the conversation;
- (iii) do not discuss confidential information in conference calls open to the general investing public;
- (iv) keep documents of any kind relating to confidential information, including personal handwritten notes, in a place to which only persons authorized to know the information have access;
- (v) always protect documents and electronic files referring to confidential information with password systems;

(vi) do not circulate internally documents containing confidential information, which must always be delivered directly to the recipient;

(vii) do not send documents with confidential information by facsimile, unless you are certain that only a person authorized to know the information will have access to the receiving device; and

(viii) without prejudice to the responsibility of the person transmitting confidential information, ask a third party outside the Company who needs to have access to the information to sign a confidentiality agreement, in which the nature of the information must be specified and a statement that the third party acknowledges its confidential nature, committing itself not to disclose it to any other person and not to trade in Securities prior to the disclosure of the information to the market must be included.

6.3. When the confidential information needs to be disclosed to an employee or agent of the Company or to another person holding a position, function or position in the Company, its controlling or controlled companies or affiliates, who is not an officer, member of the Board of Directors or the Company's fiscal committee, the person responsible for transmitting the information must ensure that the person receiving it is aware of this Policy, and also require that they sign the term contained in **Annex I** before giving them with access to the information.

7. POLICY MONITORING

7.1. It is incumbent upon the Responsible Officer to verify, in the event of a Material Act or Fact, the proper compliance with this Policy, immediately reporting any irregularity to the Board of Directors.

7.2. In the event of any of the events provided for in item 5.2 above, which imply the need to disclose a Material Act or Fact kept confidential, or breach of the confidentiality of a Material Act or Fact prior to its disclosure to the market, the Responsible Officer shall carry out investigations and internal measures in the Company, asking the people involved, who must always respond to their requests for information, in order to verify the reason that caused the possible breach of confidentiality of information.

7.2.1. The conclusions of the Responsible Officer shall be forwarded to the Board of Directors to take the appropriate measures, accompanied by any recommendations and suggestions for changing this Policy, which may in the future avoid breaching the secrecy of confidential information.

7.3. The Responsible Officer shall monitor the trading of Securities, adopting procedures so that they are informed of the trades that occur prior to the disclosure to the market of a Material Act or Fact, in order to identify any trades prohibited by current legislation by persons who were aware of such Material Act or Fact, reporting any irregularities to the Board of Directors and CVM.

8. PROCEDURES FOR COMMUNICATING INFORMATION ON MANAGEMENT NEGOTIATIONS

8.1. The officers, members of the Board of Directors, the Company's fiscal committee and any bodies of the Company with technical or advisory duties created by statutory provision must inform the Company of the ownership and negotiations carried out with Securities issued by the Company, by their controlling or controlled companies, in the latter two cases, provided that they are publicly-held companies.

8.1.1. The communication referred to in the above item shall cover (i) trading with derivatives or any other securities referenced in the Securities issued by the Company or issued by its controlling or controlled companies, in the latter two cases, provided that they are publicly-held companies, (ii) directly or indirectly carried out, within or outside organized markets, whether such negotiations take place through a controlled company, or through third parties with whom a trust agreement or portfolio or share management is maintained (except for investment funds that are not exclusive, nor may have their trading decisions influenced by the shareholders), and (iii) the application, redemption and negotiation of investment fund shares whose regulations provide that their share portfolio is composed exclusively of shares issued by the company, its controlled or controlling company.

8.1.2. The natural persons mentioned in item 8.1 must also indicate the Securities that are owned by a spouse from whom they are not judicially or extrajudicially separated, by a romantic partner, by any dependent included in their annual income tax return adjustment and of companies directly or indirectly controlled by them.

8.1.3. The communication must be sent to the Responsible Officer, who must inform the CVM and the Market Entities, according to the form template in **Annex II** hereof.

8.1.4. Communication to the Responsible Officer must be made: (i) within five (5) days of the completion of each trade; (ii) on the first business day after taking office – in this case, both for ownership purposes and for trades carried out with Securities issued by the Company and by its controlling or controlled companies, provided that it is a publicly-held company; or (iii) upon submission of documentation for registration as a publicly-held company.

8.1.5. Along with the first communication presented by the natural persons mentioned in the Clause 8.1, a list must be provided containing the name and registration number in the National Register of Legal Entities or in the Individual Taxpayer Register of the persons indicated in the item 8.1.2, and any change in this information must be informed to the Company within a period of up to fifteen (15) days as of its occurrence.

9. PROCEDURES FOR COMMUNICATING AND DISCLOSING RELEVANT NEGOTIATIONS

9.1. The Related Persons, as well as any person or group of persons, individuals or legal entities, acting together or representing the same interest, shall notify the Company of the performance of Relevant Negotiations, including the information contained in the form template

in **Annex III** hereof.

9.1.1. Communication about the performance of Relevant Negotiations shall be forwarded to the Responsible Officer immediately after reaching the aforementioned participations contained in the definition.

9.1.2. The communication obligation provided for in Clause 9.1, subject to the provisions of the applicable regulation, covers (i) the acquisition of any rights over the shares and other securities, (ii) the execution of any derivative financial instruments referenced to shares, even if without provision of physical settlement, and (iii) negotiations directly or indirectly carried out, within or outside organized markets, whether such negotiations take place through a controlled company, or through third parties with whom a trust agreement or portfolio or share management is maintained (except for investment funds that are not exclusive, nor may have their trading decisions influenced by the shareholders).

9.2. The Responsible Officer will be responsible for transmitting the information, as soon as it is received by the Company, to CVM and to the Market Entities, if applicable, pursuant to the Clause 8 above.

9.3. In cases where the acquisition mentioned in the Clause 9.1.1 above results in the alteration of or has been carried out to change the composition of the control or the administrative structure of the Company, as well as in cases where said acquisition results an obligation to carry out public offering, under the terms of the applicable regulation, the acquirer must also disclose a notice containing the information provided for in Annex D hereof, at least, through the same communication channels adopted by the Company, as described in this Policy.

9.4. Without prejudice to the provisions of this section, the Controlling Shareholder(s) must provide the Company with the information required by Article 30 of the Novo Mercado Regulation on a monthly basis, and the Company shall transmit such information to B3 in the form and within the period required by said regulation.

10. TRADING OF SECURITIES ISSUED BY THE COMPANY

10.1. Trading Impediment Periods

10.1.1. Related Persons may not trade Securities during the Trading Impediment Period, under the terms of this Policy.

10.1.2. The Responsible Officer shall inform the Related Persons of the beginning of the Trading Impediment Period, however, they are not obliged to inform the reasons for determining the Trading Impediment Period, and the aforementioned persons shall keep this determination confidential.

10.1.3. The prohibitions described herein also apply to loans of shares issued by the Company and derivatives referenced therein.

10.2. Trading Restrictions Pending Disclosure of Material Fact

10.2.1. The use of Insider Information, by any person to whom it has had access, with the purpose of obtaining an advantage, for themselves or for others, through trading in Securities is prohibited.

10.2.2. For the purpose of characterizing the offense referred to in item 10.2.1 above, it is assumed that: (i) the person who traded Securities with Insider Information, made use of such information in said trade; (ii) Controlling Shareholders, Administrators and members of the Fiscal Committee and the Company itself, in relation to transactions with its own Securities, have access to all Insider Information; (iii) the people listed in item (ii), as well as those who have a business, professional or trust relationship with the Company when they have had access to Insider Information, know that this is insider information; (iv) the administrator who leaves the Company with Insider Information avails themselves of such information if they trades Securities issued by the company within a period of three (3) months as of their resignation; (v) information about takeover, total or partial spin-off, merger and transformation operations, or any form of corporate reorganization or business combination, change in the control of the company, including through the execution, alteration or termination of a shareholders' agreement, decision to promote the deregistration of the publicly-held company or change in the environment or trading segment of its shares is relevant from the moment the assessments or analyses related to matter are initiated; and (vi) the information about the request for court-supervised or out-of-court reorganization and bankruptcy filed by the Company itself, as from the moment assessments or analyses related to such request are initiated.

10.3. **Exceptions to General Restrictions on Securities Trading**

10.3.1. The assumptions described in the item 10.2.1 above, without prejudice to the provisions of the item 11 below, do not apply:

- (i) to cases of acquisition, through private negotiation, of shares held in treasury, arising from the exercise of a call option pursuant to a stock option plan approved at the general meeting; and
- (ii) to negotiations involving Fixed Income Securities, when carried out through operations with combined repurchase commitments by the buyer, for settlement on a pre-established date, prior to or equal to the maturity of the securities object of the operation, carried out with predefined profitability or remuneration parameters.

10.3.2. The prohibition mentioned in the item 10.2.1 above does not apply to subscriptions of new Securities issued by the Company, without prejudice to the effect of the rules that provide for the disclosure of information in the context of the issuance and offer of these securities.

10.3.3. The prohibition referred to in the item 10.5.1 below does not apply to:

- (i) negotiations involving Fixed Income Securities, when carried out through operations with combined repurchase commitments by the seller and resale

commitments by the buyer, for settlement on a pre-established date, prior to or equal to the maturity of the securities object of the operation, carried out with predefined profitability or remuneration parameters.

(ii) operations intended to fulfill obligations assumed before the beginning of the prohibition period arising from loans of securities, exercise of call or put options by third parties and forward purchase and sale contracts; and

(iii) negotiations carried out by financial institutions and legal entities that are part of its economic group, provided that they are carried out in the normal course of their business and within the parameters pre-established in this Policy.

10.3.4. In compliance with the applicable regulations, the restrictions provided for in items 10.1 and 10.2 above do not apply in the event of a Plan that meets the requirements provided for in the applicable regulations, as provided for in item 11.1 below.

10.4. Trading Restrictions After Disclosure of Material Act or Fact

10.4.1. The presumptions related to the trading of the Company's Securities may be maintained, even after the disclosure of a Material Act or Fact, in the event that any trading of Securities by Related Persons may interfere, to the detriment of the Company or its shareholders, with the act or fact associated with the Material Act or Fact.

10.4.2. Even after its disclosure to the market, the Material Act or Fact must continue to be treated as not having been disclosed until a minimum period of time has elapsed for market participants to have received and processed the Material Act or Fact.

10.4.3. In the cases provided for above, even after the disclosure of a Material act or Fact, the presumptions will continue to prevail if this negotiation may interfere with the conditions of trading with Securities in such a way as to cause damage to the Company itself or to its shareholders, and such additional presumption shall be informed by the Responsible Officer.

10.5. Prohibition of Trading in a Period Prior to the Disclosure of Quarterly Information, Standardized Financial Statements and Distribution of Results

10.5.1. In the period of fifteen (15) days prior to the date of disclosure of the QFI and FSs, subject to the provisions of the applicable regulation, the Company, the Controlling Shareholders, the Administrators and the members of the Fiscal Committee are prevented from carrying out any negotiation with the Securities issued by the Company, or referenced to them, regardless of their knowledge of the content of the QFI and FSs.

10.5.2. The prohibition referred to in item 10.5.1 above does not depend on the assessment as to the existence of Insider Information or the intention in relation to the negotiation.

10.5.3. The calculation of the period referred to in the item 10.5.1 above must be done excluding the day of disclosure, but trading with securities can only be carried out on that

day after said disclosure.

10.6. Prohibition to Resolve on the Acquisition or Disposal of Shares Issued by the Company

10.6.1. The Board of Directors will not be able to approve the acquisition or sale, by the Company, of the Company's own Securities before they disclose to the public, by means of a material fact, information regarding:

- (i) execution of any agreement or contract aimed at transferring the Company's shareholding control;
- (ii) grant of an option or mandate for the purpose of transferring the Company's shareholding control; or
- (iii) existence of the intention to promote takeover, total or partial spin-off, merger, transformation or corporate reorganization involving the Company.

10.6.2. If, after approval of the repurchase program, a fact that falls under any of the three cases above occurs, the Company will immediately suspend operations with Securities issued by it until the disclosure of the respective material act or fact, pursuant to CVM Resolution 44.

10.7. Additional Prohibitions

10.7.1. The prohibitions set forth in this Policy also apply to negotiations carried out, directly or indirectly, by the Related Persons in cases where these negotiations take place through:

- (i) company controlled by it;
- (ii) third parties with whom they have entered into a securities portfolio management or trust agreement; or
- (iii) any person who has knowledge of Insider Information, through any of the Related Persons, knowing that it has not yet been disclosed to the market.

10.7.2. Trading carried out by funds of which the persons mentioned in item 10.7.1 above are shareholders are not considered indirect trading, and shall not be subject to the prohibition provided for herein, provided that:

- (i) The regulation of such funds does not provide for their share portfolio to be exclusively composed of shares issued by the Company, the Controlled Companies or their Controlling Shareholders; and
- (ii) the fund manager's trading decisions cannot in any way be influenced by their respective shareholders.

11. INDIVIDUAL INVESTMENT OR DIVESTMENT PLAN

11.1. Anyone who has a relationship with the Company that makes them potentially subject to

the presumptions described in the item 10.2.1 above may formalize an individual investment plan or individual divestment plan approved by the Company, provided that they meet the regulatory requirements, including:

- (i) purchase, by the Company, of the object of a Securities buyback program for retirement or holding in treasury;
- (ii) payment of variable compensation, received as a share in the profits and results of the Company or its Controlled Companies, in the acquisition of Securities; or
- (iii) acquisition of shares for retirement or holding treasury stock or sale of treasury stock by the Company, through private negotiation, arising from the exercise of a call option under the Company's stock option plan, duly approved by the General Meeting.

11.2. The person who so wishes may formalize in writing to the Responsible Officer a single Plan indicating the volume of funds to be invested/disinvested or the number of securities issued by the Company to be traded and the term of the investment or disinvestment.

11.3. Regardless of the provisions of their respective Plans, all persons who adopt the Plan must continue to comply with the provisions hereof.

12. POLICY CHANGE

12.1. By resolution of the Board of Directors, this Policy may be amended in the following situations:

- (i) express determination, in this regard, by the CVM;
- (ii) modification in the applicable legal and regulatory norms, in order to implement the necessary adaptations; or
- (iii) verified the need to change it by the Board of Directors, in the process of evaluating the effectiveness of the procedures adopted.

12.2. Without prejudice to further investigation and sanction, the CVM may determine the improvement or amendment of this Policy if it understands that its content does not prevent the use of relevant information in carrying out the trading, or if it understands that it does not properly comply with the applicable legislation.

12.3. The change in this Policy must be notified to CVM and the Market Entities by the Responsible Officer, and this notification must be accompanied by a copy of the resolution and the full content of the documents that govern and integrate this Policy, as required by the applicable rules, as well as the Related Persons.

12.4. This Policy cannot be changed pending the disclosure of a Material Act or Fact.

13. RESPONSIBILITY OF THIRD PARTIES

13.1. The provisions hereof do not exclude the responsibility of third parties not directly linked

to the Company and who are aware of a Material Act or Fact.

14. INFRINGEMENTS AND SANCTIONS

- 14.1. Without prejudice to the applicable sanctions under current legislation, to be applied by the competent authorities, in case of violation of the terms and procedures established in this Policy, the Board of Directors will be responsible for taking the respective disciplinary measures within the Company's internal scope, including removal from office or dismissal of the offender in cases where a serious violation is found in the understanding of the Board of Directors.
- 14.2. If the violation is committed by third parties, it may characterize 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 losses and damages.
- 14.3. If the applicable measure is within the legal or statutory competence of the Company's general meeting, the Board of Directors shall convene it to resolve on the matter.

15. GENERAL PROVISIONS

- 15.1. This Policy must be observed by the Company, by Related Persons and by Associates with Access to Insider Information.
- 15.2. The Company shall send the persons indicated in the Clause 15.1, by registered mail or e-mail with acknowledgment of receipt, a copy of this Policy, requesting them to send back to the Company the Adhesion Term duly signed in accordance with the template contained in **Annex I** hereof, which will be filed at the Company's headquarters for the time provided for in the applicable regulations.
- 15.2.1. Upon signing the term of investiture of new members of the Board of Directors, members of the fiscal committee, and officers of the Company, the signing of the Adhesion Term must be required, and they will be informed of this Policy.
- 15.2.2. The communication of this Policy, as well as the requirement to sign the Adhesion Term, to the Related Persons will be made before these persons become aware of the Material Act or Fact and carry out any negotiation with Securities.
- 15.2.3. The Adhesion Term must be filed at the Company's headquarters while the Related Persons maintain a relationship with it, and for at least five years after their termination.
- 15.2.4. The Company will keep at its headquarters, at the disposal of CVM, the list of Related Persons and their qualifications, indicating their position or role, address and registration number in the National Register of Legal Entities of the Ministry of Economy or in the National Register of Individuals of the Ministry of the Economy, updating it whenever they are changed.
- 15.3. The persons contemplated in Clause 12.1 above shall inform the Responsible Officer and

require third parties, who have a commercial, professional or trusting relationship with the Company, such as consultants, independent auditors, securities analysts, institutions that are part of the distribution system and advisors, and who need access to Insider Information, formally attest to their knowledge of this Policy and undertake not to disclose such information until it becomes public or loses its status as a Material Act or Fact

15.4. Any doubts about the provisions of this Policy must be clarified before the Responsible Officer, and any omissions will be resolved by the Board of Directors.

16. TERM

16.1. This Policy will enter into force on the date of its approval by the Board of Directors and will remain in force for an indefinite period, until there is a resolution to the contrary.

16.2. This Policy can be consulted at <http://invest.unigel.com.br/>.

ANNEX I

ADHESION TERM TO THE POLICY FOR THE DISCLOSURE OF MATERIAL ACT OR FACT AND TRADING OF SECURITIES ISSUED BY UNIGEL PARTICIPAÇÕES S.A.

By this instrument, *[insert name or company name] {or} [insert qualification – nationality, marital status, profession, ID/Alien ID Card, if you are an individual; indicate company type, if a legal entity]*, with address at *[•]*, enrolled with the *[CPF/ME] {or} [CNPJ/ME]* under No. *[•]*, in the capacity of *[indicate position held {or} “Controlling Shareholder” {or} Associates with Access to Insider Information]* of **UNIGEL PARTICIPAÇÕES S.A.**, a corporation headquartered in the city of São Paulo, State of São Paulo, at Avenida Engenheiro Luís Carlos Berrini, 105, 11º andar, registered in the National Register of Legal Entities of the Ministry of Economy (CNPJ/ME) under No. 05.303.439/0001-07 (“Company”), hereby declares having taken cognizance of the “*Policy for Disclosure of Material Act or Fact and Trading of Securities Issued by the Company*”, pursuant to CVM Resolution No. 44, of August 23, 2021, and undertakes to observe the rules and procedures provided for in such document and to guide its actions in relation to the Company always in accordance with such provisions.

[insert place and date of signature]

[NAME OR CORPORATE NAME]

ANNEX II

**NEGOTIATIONS CARRIED OUT WITH SECURITIES ISSUED BY THE COMPANY AND ITS
CONTROLLED AND/OR CONTROLLING COMPANIES THAT ARE PUBLICLY LISTED
COMPANIES**

(ARTICLE 11 OF CVM RESOLUTION 44)

Time period: <i>[month year]</i>	
Name of Purchaser or Transferor:	
Qualification:	CNPJ/CPF:
Trading Date:	
Issuing company:	
Type of Business:	
Type of Security:	
Total amount:	
Amount by Type and Class:	
Balance of the position held before trading (direct or indirect):	
Balance of the position held after trading (direct or indirect):	
Form of acquisition/sale:	
Price:	
Brokerage Used:	
Other Relevant Information:	

ANNEX III

CARRYING OUT RELEVANT NEGOTIATIONS

(ARTICLE 12 OF CVM RESOLUTION 44)

Time period: <i>[month year]</i>	
Name of Purchaser/Transferor:	
Qualification:	CNPJ/CPF:
Trading Date:	
Type of Business:	
Type of Security:	
Purpose of participation:	
Targeted Amount:	
If applicable, a declaration by the purchaser that their purchases are not intended to change the composition of the Company's control or administrative structure:	
Number of shares and other securities and derivative financial instruments referenced in such shares (amount, class and type):	
Agreement or contract regulating the exercise of voting rights or the purchase and sale of securities issued by the Company:	
Shareholder resident or domiciled abroad:	Name/Corporate Name of Agent/Legal Representative:
	CNPJ/CPF:
Other Relevant Information:	