



Policy for Disclosure of Information

Version 5.0

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VERSIONS CONTROL

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Policy for Disclosure of Information	V 2.0	27/03/20	NTS	Board of Directors	Second Version
Policy for Disclosure of Information	V 3.0	10/11/21	NTS	Board of Directors	Review in order to update references to CVM (Brazilian Securities Exchange Commission) instructions, now to Resolution 44.
Policy for Disclosure of Information	V 4.0	17/03/22	NTS	Board of Directors	Review of Communication Channels, in order to allow the use of news websites.
Policy for Disclosure of Information	V 5.0	09/11/23	NTS	Board of Directors	Description of Material Fact and Notices

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1. Definitions

The terms and expressions listed below, both in singular and in plural, when used in this Policy for Disclosure of Information ("Disclosure Policy"), shall have the following meanings:

"Controlling Shareholders": means the shareholder or group of shareholders bound by a shareholders' agreement or under common control exercising control over the Company, pursuant to the Brazilian Corporations Law.

"Officers": means the executive officers and members of the board of directors, effective and alternate, of the Company and any other bodies with technical or consultative functions, created or that may be created by statutory provision by the Company.

"Stock Exchanges": means the stock exchanges and entities of the organized over-the-counter market in which the Securities issued by the Company are or will be admitted to trading.

"CPF": means Individual Taxpayer Registration Number.

"CNPJ": means Corporate Taxpayer Registration Number.

"Affiliated Companies": means the companies in which the Company has significant influence, under the terms of the Brazilian Corporations Law.

"Company": means Nova Transportadora do Sudeste S.A. – NTS.

"Fiscal Board Member": means the effective and alternate members of the Company's fiscal board.

"Controlled Companies": means the companies in which the Company, directly or through other controlled companies, holds shareholder rights that permanently assure it a preponderance in the corporate resolutions and the power to elect the majority of the officers.

"CVM": means the Brazilian Securities and Exchange Commission.

"DRI": means the investor relations executive officer of the Company, responsible for providing information to the investing public, CVM and Stock Exchanges, as well as updating the publicly-held company registry and monitoring and overseeing compliance with this Disclosure Policy.

"Notice to the Market": has the meaning assigned to it in item 5.4 of this Disclosure Policy.

"Privileged Information": means any Relevant Information not yet disclosed to the market and the investing public.

"Relevant Information": means all and any decision made by a Controlling Shareholder, a resolution of the Company's general shareholders' meeting or the Company's management bodies or any other political-administrative, technical, business or economic-financial act or fact that occurred or is related

to the Company's business, which may have significant influence (i) in the quotation of the Securities issued by the publicly-held Company or securities and derivatives referenced thereto; (ii) in the investors' decision to buy, sell or hold the Securities; or (iii) in the investors' decision to exercise any rights inherent to the condition of holder of Securities issued by the publicly-held Company or securities and derivatives referenced therein.

"Resolution CVM n° 44": means the CVM Resolution n° 44, of August 23rd, 2021, as amended, which provides for the disclosure of a material act or fact related to publicly-held companies, as well as on the trading of securities issued by publicly-held companies pending material fact not disclosed to the market, among other matters.

"Corporations Law": means Law No. 6,404, of December 15, 1976, as amended.

"Related Persons": has the meaning assigned to it in item 3.1 of this Disclosure Policy.

"Adhesion Term": means the formal instrument, the model of which is part of this Disclosure Policy as Appendix I, to be signed by the Related Persons, pursuant to article 17, paragraph first of Resolution CVM n° 44. The Adhesion Term is the instrument capable of evidencing the formal adherence of the signatory to the rules contained in the Disclosure Policy, undertaking the obligation to comply with it and to ensure that subordinates and trusted third parties do the same.

"Securities": means any securities issued by the Company, such as any shares, debentures, subscription warrants, receipts and subscription rights, promissory notes, call options or any other collective investment securities or contracts issued by the Company, or referred to them, that by legal determination are considered as securities.

2. Objective

2.1. The main purposes of this Disclosure Policy is to establish and clarify the criteria and procedures to be observed by the DRI and other Related Persons regarding the disclosure of Relevant Information and the maintenance of the confidentiality of the Privileged Information in order to develop a continuous flow of information and to keep investors' expectations realistic, through the broad and immediate disclosure of the Relevant Information, in accordance with the applicable laws and regulations.

3. Purpose and Scope

3.1. This Disclosure Policy is applicable and shall be observed by the Company itself and by the following persons ("Related Persons"):

- (i) Direct or indirect Controlling Shareholders;
- (ii) Officers (Board of Directors and Executive Officers);

- (iii) Fiscal Board Members;
- (iv) members of committees and bodies of the Company with technical or advisory functions created by statutory provision; and
- (v) any person who has commercial, professional or trust relationship with the Company when having access to Relevant Information not disclosed and acknowledging it relates to Privileged Information.

3.2. The Related Persons shall adhere to the Disclosure Policy by signing the Adhesion Term, according to the template in [Appendix I](#), which shall remain filed at the Company's headquarters as long as these persons maintain a relationship with the Company and also for five (5) years, at least, after their dismissal.

3.3. The Company will keep filed in its headquarters an updated list of the Related Persons who sign the Adhesion Term with the respective qualifications, position or function, address and registration number in the CPF or CNPJ, as applicable, updating it whenever any change occurs.

3.4. The Related Persons have the obligation to immediately notify the Company, in writing, of any change to their registered information.

4. DRI's and Related Persons' Duties

4.1. Without prejudice to the other duties and responsibilities set forth in the applicable legislation and regulations, as well as in this Disclosure Policy, the following are attributions of the DRI:

- (i) disclose and communicate to CVM and Stock Exchanges and capital market entities, immediately after its acknowledgement, information about any fact or event occurred or related to the Company's business that is or may be considered as Relevant Information;
- (ii) in the event of inquiries made by CVM or Stock Exchanges, or in the event of an atypical oscillation in the quotation, price or negotiated quantity of the Securities, the DRI shall inquire the Related Persons, as the case may be, in order to determine whether they have knowledge of Relevant Information that must be disclosed to the market;
- (iii) ensure the broad and immediate dissemination of the Relevant Information simultaneously, whenever possible, on the Stock Exchanges and in all markets in which the Company has Securities admitted to trading, as well as to the investing public in general, including the press, or at meetings of professional associations, investors, analysts or with a selected audience, within the country or abroad;
- (iv) to settle any questions related to the nature of the Privileged/Relevant Information of certain acts and facts;

- (v) analyze and decide on the characterization of a fact or an act as Relevant Information and participate in the decision-making process regarding the convenience or not of its immediate disclosure to the market;
- (vi) if the disclosure of the Relevant Information during the trading hours of the Securities is imperative, to observe the regulatory procedures of the Stock Exchanges, including contacting the respective Stock Exchange prior to the actual disclosure of the Relevant Information to the market, observing the terms of item 5.5 of this Disclosure Policy;
- (vii) inform CVM, by the 10th (tenth) day of each month, and, if applicable, the Stock Exchanges, the quantity, characteristics and form of acquisition of the Securities issued by the Company and by the Controlled Companies or Controlling Shareholders that are publicly-held companies, by the Officers, Fiscal Board Members and members of any bodies with technical or consultative functions, created by statutory provision, as well as changes in their positions.

4.1.1. The DRI is responsible for monitoring and executing this Disclosure Policy.

4.1.2. Any questions about the provisions of this Disclosure Policy, the guidelines of the DRI and / or the need to disclose certain information to the public must be clarified with the DRI.

4.2. Without prejudice to the other duties and responsibilities set forth in the applicable legislation and regulations, as well as in this Disclosure Policy, the following are duties of Related Persons:

- (i) communicate the DRI about any Relevant Information of which they are aware of; and
- (ii) if they have personal knowledge of a Relevant Information, whenever they realize the DRI's omission in the compliance with its duty to disclose the respective Relevant Information, immediately communicate such Relevant Information to CVM.

5. Guidelines on description of Material Fact and Notice to the Market

5.1. Without prejudice to the responsibilities of the DRI and Related Persons, the Company will not release projections or guidance, and, therefore, any numerical or temporal references mentioned in documents produced by the Company should not represent or be interpreted as a promise of performance, projection, expectation of results, performance or similar.

5.2. The Company will not comment on speculative information in the market unless it is characterized as Relevant Information.

5.3. The Notice to the Market is an instrument through which the Company will release the communications provided in CVM Resolution 44 that are not characterized as Relevant Information and that the DRI understands as useful to be released to the market in general, such as, for example, the material presented at public meetings or conferences with analysts.

5.4. The publication of a Notice to the Market is optional and its objective is greater transparency among the Company and its investors, so that, deeming any information relevant, even if its disclosure is not required by current legislation and regulations, the Company will take said information to the knowledge of its investors.

6. Procedures for the Disclosure of Relevant Information

6.1. Communication Channels. Under the terms of applicable regulations, the disclosure of Relevant Information shall be carried out through the following channels:

- (i) electronic system available on CVM website;
- (ii) Company's investor relations website (<https://ri.ntsbrasil.com>); and
- (iii) widely circulated newspapers usually used by the Company or at least 1 (one) news website, which makes available, in a section available for free access, the entire information.

6.2. The disclosure of the Relevant Information in widely circulated newspapers usually used by the Company may be carried out by means of the publication of an ad containing the summary description of the Relevant Information, provided it indicates an internet address where a complete description of the Relevant Information is available, with a content, at least, identical to the one sent to CVM and Stock Exchanges.

6.3. In the event of disclosure of the Relevant Information by any means of communication, including information to the press or in a meeting with class entities, investors, analysts or a selected public, in the country or abroad, the Relevant Information shall be disclosed simultaneously to CVM, Stock Exchanges and to the investing public in general, through the official channels, in accordance with the applicable regulations.

6.4. Whenever possible, the disclosure of the Relevant Information shall occur before the beginning or after the closing of the trading on Stock Exchanges, observing that, if there is simultaneous trading in more than one Stock Exchange in different countries, the trading hours of Stock Exchanges located in the Brazilian territory shall prevail.

6.5. If it is imperative that the disclosure of the Relevant Information occurs during trading hours, the DRI may request, always simultaneously to the Stock Exchanges in which the Company's Securities are admitted to trading, to suspend the trading of the Company's Securities for the time

necessary to the adequate dissemination of the Relevant Information, observing the procedures set forth in the regulations issued by Stock Exchanges.

6.6. The disclosure of the Relevant Information shall be made in a clear and precise manner, in a language accessible to the investing public, without emphasizing in excess favorable news or undervaluing unfavorable news, and indicating, whenever possible, the amounts involved, deadlines and any other clarifications that the Company understands relevant for the proper understanding and more accurate evaluation of the Relevant Information by the market.

6.7. Exception to the immediate disclosure. The Relevant Information may not be disclosed in exceptional cases, upon justification, after analysis and decision of the DRI, of the Controlling Shareholders or of the Officers, as the case may be, that its disclosure may jeopardize the Company's legitimate interest.

6.8. If the Relevant Information is related to operations that directly involve the Controlling Shareholders and they decide not to disclose it, they shall inform such decision to the DRI.

6.9. In other cases, when the Relevant Information is connected to operations involving the Company, the Officers shall decide whether or not to disclose the Relevant Information and inform the DRI.

6.10. The Controlling Shareholders and the Officers, through the DRI, may decide to submit to CVM's evaluation questions regarding the disclosure to the public of a Relevant Information that may jeopardize the legitimate interest of the Company, and such request must be addressed to the *Superintendência de Relações com Empresas – SEP* through electronic mail sent to the *SEP* institutional address, having as a subject "confidentiality request"; or in an envelope sealed, which shall bear the word "Confidential" highlighted.

6.11. The Controlling Shareholders and the Officers are obliged to, directly or through the DRI, immediately disclose the Relevant Information, in the event of the loss of the information's control or the occurrence of an atypical oscillation in the quotation, price or negotiated quantity of the Securities.

7. Obligation of Confidentiality

7.1. The Related Persons must keep confidential any Privileged Information to which they have access to due to their position or function, until their disclosure to the market, as well as ensure that subordinates and third parties of their trust also do so, being jointly and several liable with them in the hypothesis of noncompliance.

7.2. The Related Persons must refrain from discussing the Relevant Information in public places, and must only deal with matters related to Relevant Information with those that need to know the Relevant Information.

7.3. The Related Persons shall:

- (i) communicate immediately to the DRI about any violations of this Disclosure Policy of which they are aware of;
- (ii) not to use the Privileged Information to obtain, directly or indirectly, for themselves or for third parties, any pecuniary advantages, including through the purchase or sale of Securities; and
- (iii) if inadvertently or without authorization, in any way, communicate, in person or through third parties, Privileged Information to persons that are not bound to this Disclosure Policy nor subject to an obligation of confidentiality, inform such act immediately to the DRI so that it adopts the measures that it deems fit.

7.4. Whenever there is any doubt about the relevance of the Privileged Information, the DRI must be contacted in order to clarify the referred doubt.

8. Disclosure of Information on Officers' Negotiations

8.1. In accordance with article 11 of Resolution CVM nº 44, the Officers, Fiscal Board Members and members of bodies with technical or advisory functions created by statutory provision shall communicate to the Company, in the person of the DRI, ownership and negotiations made with Securities issued by the Company itself and issued by the Controlling Shareholders or Controlled Companies, in the latter two cases, provided that they are publicly-held companies.

8.1.1. The communication referred to in item 7.1 shall indicate the ownership and the negotiations made in their own names and also the Securities that are owned by a spouse of which they are not judicially or extrajudicially separated, a partner, any dependents included in the declaration of annual adjustment of income tax and directly or indirectly controlled companies, also containing:

- (i) the name and qualification of the communicant and, if applicable, the persons mentioned in item 7.1.1, indicating the respective registration number of enrollment with CPF or CNPJ;
- (ii) the quantity, by type and class, in the case of shares, and other characteristics in the case of other Securities, in addition to the identification of the issuing company and the balance of the position held before and after the reported transaction; and
- (iii) the form of acquisition or sale, price and date of the transactions.

8.1.2. The communication referred to in item 7.1 shall be sent to the DRI in the specific forms:

- (i) on the first business day after the investiture in the position, occasion in which a relation with the name and CPF or CNPJ registration number of the persons mentioned

in item 7.1.1 above must also be submitted, undertaking to inform the Company of any change in this relationship within fifteen (15) days as of the change; and

- (ii) within 5 (five) days after the completion of each business.

8.2. It is incumbent upon the DRI to forward the information received to CVM and Stock Exchanges within ten (10) days after the end of the months in which: (i) there are changes in the positions held; (ii) the investiture in the position of the persons mentioned in item 7.1 occurs; and (iii) there is a change in the list of persons provided for in item 7.1.1.

8.2.1. The DRI shall deliver the information in an individual and in a consolidated manner based on the bodies indicated therein, making it available in the electronic system available on CVM website:

- (i) the individual positions of the Company itself, its Affiliated and Controlled Companies; and
- (ii) the positions, consolidated based on each body separately, held by the Officers, Fiscal Board Members and other bodies with technical or advisory functions created by statutory provision.

9. Disclosure on the Acquisition or Sale of Relevant Equity Participation

9.1. In accordance with article 12 of the Resolution CVM nº 44, the direct and indirect Controlling Shareholders and the shareholders who elect members of the Company's Board of Directors or Fiscal Board, as well as the individual or legal entity, or group of persons acting jointly or representing the same interest, that conduct relevant negotiations shall immediately inform the DRI about the relevant negotiation, also informing:

- (i) the name and qualification, indicating the enrollment number with CNPJ or with CPF;
- (ii) the objective of the participation and the quantity targeted, containing, if applicable, a statement that the negotiation is not intended to change the control's composition or the administrative structure of the company;
- (iii) the number of Securities, specifying, in the case of derivative financial instruments referenced in such shares, whether their liquidation is physical or financial, the quantity, class and type of referenced shares;
- (iv) indication of any agreement or contract regulating the exercise of voting rights or the purchase and sale of Securities; and

- (v) if they are resident or domiciled abroad, the name or corporate name and the CPF or CNPJ enrollment number of their attorney-in-fact or legal representative in the country.

9.1.1. Relevant negotiation shall be understood as the negotiation or the set of negotiations through which the direct or indirect participation of the persons referred to in item 8.1 exceeds, upwards or downwards, the levels of five percent (5%), ten percent (10%), fifteen percent (15%), and so on, of a type or class of shares representing the Company's capital stock.

9.1.2. Observing the requirements contained in §§ 3, 4 and 5 of article 12 of Resolution CVM nº 44, the obligations provided for in this item also extend to:

- (i) the acquisition of any rights over the shares and other securities mentioned therein; and
- (ii) the execution of any derivative financial instruments referenced to shares referred to in item 8.1, even if there is no provision for physical settlement.

9.2. The communication regarding a relevant negotiation shall be transmitted to CVM as soon as it is received by the DRI and, as the case may be, to the Stock Exchanges.

10. Penalties

10.1. The Related Persons who sign the Adhesion Term undertake to respect and comply with all the provisions of this Disclosure Policy, being subject, in case of noncompliance, to the penalties set forth in Law No. 6,385, of December 7th, 1976, as amended, and the applicable regulations.

11. General Provisions

11.1. This Disclosure Policy shall be governed in all its terms, as well as in cases not covered by the Resolution CVM nº 44 and applicable regulations.

11.2. This Disclosure Policy shall enter into force on the date of its approval by the Board of Directors, remaining in force for an indefinite period until there is a deliberation to the contrary.

11.3. Any change in the Disclosure Policy must be approved by the Company's Board of Directors and communicated to CVM and Stock Exchanges.

12. Appendix I – Adhesion Term to the Policy for Disclosure of Information

ADHESION TERM TO THE POLICY FOR DISCLOSURE OF INFORMATION

By this instrument, [*name*], [*marital status*], [*profession*], commercial address at [*address*], enrolled with [CPF] [passport] under No. [●] and bearer of the Identity Card RG No. [●] (“Declarant”), as [*position*] of **NOVA TRANSPORTADORA DO SUDESTE S.A. - NTS**, a corporation with headquarters in the city of Rio de Janeiro, State of Rio de Janeiro, Praia do Flamengo, No. 200, 23th floor, Zip Code 22210-901, enrolled with CNPJ under No. 04.992.714/0001-84 (“Company”), hereby declares (1) to be fully aware of the Company’s Policy for Disclosure of Information (“Disclosure Policy”), which was based on applicable laws and regulations, including Resolution CVM nº 44; (2) to expressly agree with all provisions and rules and to be subject to the procedures set forth in the Disclosure Policy for disclosure and use of information; (3) to know the penalties in case of noncompliance of the Disclosure Policy, set forth in Law No. 6,385, of December 7, 1976, as amended, and the applicable regulations.

In addition, the Declarant expressly undertakes personal responsibility for compliance with the rules contained in the Disclosure Policy, being obliged, immediately, to guide its actions in the Company always in accordance with such rules, subject to fines and penalties applicable under the terms of the Disclosure Policy. The Declarant is bound by both the obligations directly attributable to it and by the fact that the Company and persons under its influence, including controlled, affiliated or jointly-controlled entities, spouses and dependents included in the annual income tax return statement, must fulfill the duties established in the Disclosure Policy.

[Location], [==][●], [==].

[*insert name of the declarant*]

Witnesses:

1.	2.
Name:	Name:
ID:	ID:
CPF:	CPF: