

MADERO INDÚSTRIA E COMÉRCIO S.A.

INFORMATION DISCLOSURE AND SECURITIES TRADING POLICY

1. OBJECTIVES

1.1. This Policy on the Disclosure of Information and Trading of Securities of Madero Indústria e Comércio S.A. ("Company"), formulated in accordance with CVM rules, aims to: (i) establish the procedures related to the disclosure of acts or Material Facts; (ii) establish standards of good conduct that must be observed by Related Persons; (iii) ensure compliance with laws and rules that prohibit the practice of using relevant information that has not yet been disclosed, by any person that might have had access, with the intention of gaining an advantage for themselves or anybody else, through the trading of Securities; and (iv) establish the rules to ensure compliance with the best practices for trading Company issued Securities.

2. SCOPE

2.1. Applies to Related Persons and Close Relatives, even if they have not expressly adhered to this Policy by signing the Term of Adhesion, according to the model in the Annex of this Policy.

3. REFERENCES

3.1. This Policy has as references: (i) the rules from the Company's corporate governance Bylaws; (ii) CVM Resolution 44; (iii) Law nº 6.404, of December 15, 1976, as amended ("Brazilian Corporate Law"); (iv) the Brazilian Code of Corporate Governance – Publicly-Held Companies ("CBGC"); and (v) the Novo Mercado Regulation B3 S.A. – Brasil, Bolsa, Balcão.

4. DEFINITIONS

4.1. The following terms that begin with capital letters shall be interpreted in accordance with their corresponding meanings, as indicated below:

"Controlling Shareholder" is the shareholder or group of shareholders bound by a shareholders' agreement or under common control, that is directly or indirectly a holder of shareholder rights, that ensure, on a permanent basis, the majority vote in the General Assembly's resolutions and the power to elect the majority of the Company's Managers; and that effectively uses its power to direct the corporate activities and guide the Company's functioning, pursuant to Brazilian Corporate Law.

"Shares" are the Company issued shares.

"Directors" are the members of the Board of Directors and the Executive Board.

"B3" – is B3 S.A. – Brasil, Bolsa, Balcão.

"Committees" are any statutory or non-statutory committees that advise the Company's Board of Directors.

"Company" is Madero Indústria e Comércio S.A.

"Board of Directors" means the Company's Board of Directors.

"Fiscal Council" is the Company's Fiscal Council, when installed.

CVM – is the Brazilian Securities and Exchange Commission.

"Director" is any member of the Board of Directors.

"Investor Relations Officer" is the Company Director responsible for providing information to investors, CVM and Market Entities, as well as for updating the Company's registries at the CVM, and companies with shares traded on the stock exchange of the Company with CVM, as well as the implementation and monitoring of this Disclosure and Trading Policy.

"Board" is the Company's Board of Directors.

"Market Entities" are any stock exchanges or organized over-the-counter market entities, in Brazil or abroad, in which the Securities issued by the Company are or will be admitted for trading.

"Former Directors" are people who were former Directors, but who no longer belong to the Company's management.

"Employees with access to Privileged Information" are Company employees, that due to the nature of their function or position in the Company, have access to any kind of Privileged Information.

"Material Fact" is any decision by the Controlling Shareholder, or resolution from the General Assembly or the Company's management bodies, or any other act or fact of a political-administrative, technical, business or economic-financial nature, which has occurred or is related to the business of the Company, and which may significantly influence (a) the quote of the Securities issued by the Company or referenced to them, or (b) investor's decisions to buy, sell or hold such Securities, or (c) the investor's decision to exercise any rights inherent to the condition of holder of Securities issued by the Company or referenced to them.

"Inside Information" is any Material Fact that has not yet been disclosed to the market.

"Brazilian Corporate Law" is Law No. 6.404, from December 15, 1976, as amended.

"Members of the Fiscal Council" are the effective and replacement members of the Company's Fiscal Council, elected by a General Assembly resolution.

"Close Relatives" are the persons who are linked to the Directors, Controlling Shareholders of the Company, Members of the Fiscal Council and members of the Committees, as follows: (i) the spouse, from which he/she is not legally or extrajudicially separated; (ii) the partner; (iii) any dependent included in their annual income tax adjustment statement; and (iv) any relative up to the second degree; and (v) companies directly or indirectly controlled by the Controlling Shareholders, Directors, members of the Committees and Members of the Fiscal Council or persons listed in items "i" to "iii" above.

"Trading Restriction Period" is any period in which the trading of Securities is prohibited by regulatory order or by resolution from the Investor Relations Officer.

"Related Persons" are the persons indicated in article 13 of CVM Resolution 44, including the Company, the Controlling Shareholders, Directors, Members of the Board of Directors, Members of the Fiscal Council and any bodies with technical or advisory functions, created by statutory provisions, or by anyone who, by virtue of their position, function or position in the Company, its Subsidiaries, Controller company or affiliates, who have expressly adhered to the Term of Adhesion and are aware of Inside Information about the Company, as well as those who are aware of the Insider Information and those who have a commercial, professional or trust relationship with the Company, such as independent auditors, securities analysts, consultants and institutions that are part of the distribution system.

"Investment Plan" is an individual investment or disinvestment plan formalized by a Related Person, pursuant to article 15 from CVM Resolution 44, or by any other person that may be related to the Company which makes them subject to the assumptions found in § 1 of article 13 from CVM Resolution 44.

"Disclosure and Trading Policy" or "Policy" is this Policy on Disclosure of Information and Trading Securities.

"CVM Resolution 44" is CVM Resolution 44, from August 23, 2021.

"Subsidiaries" are Company controlled entities.

"Adhesion Instrument" is the instrument of adherence to this Disclosure and Trading Policy, which will be signed in accordance with the template included in the Annex, in accordance with article 17, paragraph 1, from CVM Resolution 44.

"Securities" are any assets issued by the Company, or referenced to them that, by legal definition, are considered securities, including shares, debentures, real estate receivables certificates, subscription bonus, subscription receipts and rights, promissory notes, put or call options or derivatives of any kind, or any other security or collective investment contracts issued by the Company or referenced thereto, which, by legal definition, are considered a "transferable security".

5. RESPONSIBILITIES

5.1. The Related Persons shall observe and ensure compliance with this Disclosure and Trading Policy, as well as the applicable legislation, and, if necessary, shall contact the Investor Relations Officer to consult on situations that conflict with this Policy or in the occurrence of situations described herein.

5.2. The Investor Relations Officer shall comply with and ensure compliance with the guidelines established in this Disclosure and Trading Policy, in addition to clarifying questions on its content and application.

6. GUIDELINES

6.1. The Disclosure and Trading Policy is based on the following principles and objectives:

- (a) To provide adequate information to shareholders and Market Entities;
- (b) To ensure the wide and timely disclosure of Material Facts, as well as ensure their confidentiality before disclosure;
- (c) To consolidate good corporate governance practices; and
- (d) To cooperate with the health and development of the Brazilian capital market.

7. DISCLOSURE OF INFORMATION

7.1. Disclosure Procedures

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

- (a) Disclosure must be communicated to the CVM simultaneously to the Market Entities, preferably after the closing of business in all countries where the Securities issued by the Company in the Market Entities are traded, or, if

disclosure is necessary before the opening of the trading session, it must occur at least 1 (one) hour before the trading of the securities issued by the Company in the Market Entities, without adversely affecting the provisions of item (b) below. If and when the Securities issued by the Company are traded simultaneously in Brazilian and foreign Market Entities, the disclosure must be communicated, as a general rule, before or after the end of trading in all countries, in which the opening hours of the Brazilian market will prevail in cases of incompatibility;

- (b) In exceptional cases, in which it is absolutely necessary to disclose a Material Fact during the trading of securities issued by the Company on B3, the Investor Relations Officer must contact B3 prior to the effective disclosure of the Material Fact, which may suspend trading securities issued by the Company, pursuant to the applicable regulations. If it is necessary to disclose a Material Fact during the trading of securities issued by the Company in Market Entities other than B3, the procedure adopted by such Market Entities will apply, given that, in the event of incompatibility, the B3's applicable regulation will prevail; and
- (c) Disclosure must be clear and precise, in a language that is accessible to the investor audience, through the news portal with the Internet page indicated in the Registration Form and on the Company's investor relations *website*, at the address (ri.grupomadero.com.br).

7.1.2. The Related Persons who have access to information on Material Facts will be responsible for communicating this information to the Investor Relations Officer and must verify that, after communication, the Investor Relations Officer has taken the measures provided for in this Policy and in the applicable law, with respect to information disclosure.

7.1.2.1. If the Controlling Shareholders, Directors, Members of the Board of Directors, the Fiscal Council and any bodies with technical or advisory functions, created by statutory provision and third parties that have personal knowledge of a Material Fact, as per Clause 7.1.2 above, verify the Investor Relations Officer's failure to comply with his duty to communicate and disclose including in the hypothesis of atypical oscillations or leaks, these Related Persons shall immediately communicate the Material Fact to CVM.

7.1.3. Whenever CVM or the Market Entities require the Investor Relations Officer to provide additional clarifications regarding the communication and disclosure of a Material Fact, or if there is an atypical fluctuation in the quotation or in the trading volume of Securities issued by the Company or referred to them, the Investor Relations Officer shall inquire from the persons with access to information about the Material Fact, in order to verify whether such persons are aware of the information that must be disclosed to the market.

7.1.3.1. The Company's Managers and other employees who may be questioned, as provided for in this item, must promptly respond to the request by the Investor Relations Officer. If it is not possible to contact the Investor Relations Officer on the same day that the Managers or employees become aware of the CVM or Market Entities requirement, the Managers or employees in question must send an email with information and clarification to ri@grupomadero.com.br.

7.2. DISCLOSURE EXCEPTIONS

7.2.1. Exceptionally, the Material Facts may not be disclosed if any of the Controlling Shareholders or the Company's Directors' understand that their disclosure will jeopardize the Company's legitimate interest. In such cases, the procedures set forth in this Disclosure and Trading Policy shall be adopted to ensure the confidentiality of such Material Facts.

7.2.2. If the Material Fact is related to transactions that directly involve any of the Controlling Shareholders, they must inform the Investor Relations Officer and, exceptionally, may instruct the Investor Relations Officer not to disclose the Material Fact, stating the reasons why they believe that disclosure would put the Company's legitimate interest at risk. In such cases, the procedures set forth in this Disclosure and Trading Policy shall be adopted to ensure the confidentiality of such a Material Fact.

7.3. The Controlling Shareholder or Company Directors are obliged to immediately disclose the Material Fact, directly or through the Investor Relations Officer, in any of the following cases:

- (a) If the information has become known to third parties unrelated to the Company and to the eventual business that characterizes the Material Fact, without being bound by an obligation to confidentiality with the Company;
- (b) if there is concrete evidence and a well-founded fear that there was a breach in the confidentiality of the Material Fact; or
- (c) if there is an atypical fluctuation in the quotation, price or quantity of traded Securities issued by the Company or referenced to them.

7.3.1. If the Investor Relations Officer does not take the necessary measures for the immediate disclosure mentioned in this item, it will be up to the Controlling Shareholder and Company Directors', through its Chairman, to adopt due measures.

7.3.2. The Investor Relations Officer shall always be informed about Material Facts kept confidential, and it is his/her responsibility, together with other persons aware of such information, to ensure that appropriate procedures to ensure confidentiality are adopted.

7.3.2.1. Whenever there is a reasonable doubt on the legitimacy of the non-disclosure of information, by those who are aware of the Material Fact kept confidential, the matter may be submitted to CVM, in a confidential manner, as provided for in the applicable rules.

7.4. PROCEDURES FOR PRESERVING CONFIDENTIALITY

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

7.4.2. The following procedures must also be observed:

- (a) involve only the people deemed necessary for actions that may result in Material Facts;
- (b) not discuss confidential information in the presence of third parties who are not aware of it, even if expected that these third parties cannot perceive the meaning of the conversation;
- (c) not discuss confidential information in conference calls in which you cannot be sure who the participants are;
- (d) take the necessary and appropriate measures to maintain the confidentiality of documents, in physical or electronic format, that contain confidential information (security, password protection, etc.); and
- (e) without adversely affecting the responsibility of whoever is transmitting confidential information, require a third party, who does not belong to the Company and needs access to confidential information, to sign a confidentiality agreement, in which the nature of the information must be specified and shall contain a declaration that the third party recognizes its confidential nature, committing to not disclose to any other person, nor to deal with the Securities issued by the Company, prior to the disclosure of the information to the market.

7.4.3. When confidential information needs to be disclosed to the Company's employees or other persons with a function or position in the Company, its Controlling Shareholders, Subsidiaries or affiliates, except Director, members of the Fiscal Council, any of the Committees or any one of the Company's statutory bodies that may be created with technical or advisory functions, the person responsible for transmitting the confidential information must ensure that the person receiving the confidential information is aware of the provisions of this Policy.

8. SECURITIES TRADING

8.1. Trading Prohibition

8.1.1. The prohibitions and mandatory communications provided for in this Policy apply to (i) within or outside of regulated securities market environments ; and (ii) Securities lending transactions carried out by Related Persons.

8.1.2. The prohibitions and communication obligations set forth in this Policy also apply to negotiations carried out, directly or indirectly, by Related Persons or Close Relatives, including cases in which these transactions are made through:

- (a) companies controlled by the people mentioned above, directly or indirectly;
- (b) third parties with whom a contract has been signed for the management, *trust* administration of an investment portfolio in financial assets;
- (c) attorneys or agents;
- (d) spouses from whom they are not judicially or extrajudicially separated, partners and any dependents included in their annual income tax adjustment statement; and
- (e) any persons who have knowledge of Inside Information, through any of the persons prohibited from trading, aware that they have not yet been disclosed to the market.

8.1.3. For the purposes of this Disclosure and Trading Policy, trading carried out by investment funds, whose shareholders are the persons mentioned in the item above, will not be considered indirect trading, provided that: (i) the investment funds are not exclusive; and (ii) the fund manager's or investment fund manager's trading decisions cannot, in any way, be influenced by its shareholders.

8.2. Trading Restriction Periods

8.2.1. Related Persons are prohibited from exercising call options and/or trading Securities during the Trading Restriction Period.

8.2.2. In addition to the Trading Restriction Periods determined by applicable laws and regulations, the Investor Relations Officer may decide to impose Trading Restriction Periods. In this case, he/she must clearly indicate to the Related Persons the beginning and the end of the term of these additional Trading Restriction Periods.

8.2.2.1. The Investor Relations Officer is not required to inform the reasons for determining the Trading Restriction Period.

8.2.2.2. In any case, the Related Persons shall keep the information on the determination of the Trading Restriction Period defined by the Investor Relations Officer confidential.

8.2.2.3. Failure to communicate by the Investor Relations Officer about the Trading Restriction Period will not exempt the Related Persons from complying with this Disclosure and Trading Policy and the provisions of CVM Resolution 44 , in addition to other normative CVM instructions.

8.3. Trading Restriction Period in the Case of Non-Disclosure of a Material Fact

8.3.1. In the event of the existence and access to or knowledge of Inside Information, Related Persons are prohibited from trading Securities until the Inside Information is disclosed to the market.

8.4. Restriction Period on Trading After Disclosure of the Material Fact

8.4.1. In the cases described above, even after the disclosure of the Material Fact, the trading restriction will continue to prevail if it may interfere with the aforementioned trading, and if such interference may result in damages to the Company or its shareholders. Such additional restrictions will be informed by the Investor Relations Officer.

8.5. Trading Restriction Period Before Disclosure of Financial Information

8.5.1. The Related Persons may not trade Securities, within a period of 15 (fifteen) days before the disclosure or publication and on the day of disclosure, as is the case of, of: (i) quarterly information of the Company (ITR); (ii) the Company's standardized financial statements (DFP); and (iii) any early disclosure of the financial information mentioned in items (i) or (ii) of this paragraph.

8.5.2. The Trading Restriction Period of 15 (fifteen) days will be brought forward in the event of any early disclosure of financial information. In this case, the Investor Relations Officer will inform the Related Persons as soon as possible, after becoming aware of the early disclosure of the financial information.

8.6. Trading Restriction Period for Former Directors

8.6.1. Former Directors who no longer belong to the Company's management before the public disclosure of a Material Fact related to any business or fact initiated during their period of administration may not trade Securities for a period of 3 (three) months after their departure or until the Company discloses such

Material Fact to the market, whichever occurs last, subject to the provisions of Clause 8.9.1 below.

8.6.2. If the trading of Securities, even after the disclosure of the Material Fact, may interfere with the conditions the disclosed trading, and such interference may cause damage to the Company or its shareholders, the Former Directors are prohibited from trading Securities during a minimum period of 3 (three) months after their departure from the Company.

8.7. Special Prohibitions

8.7.1. Notwithstanding the prohibitions provided for above and in CVM Resolution 44, Related Persons are prohibited from directly or indirectly trading Securities issued by the Company in the period prior to the disclosure of any Material Fact related to the decision taken by the Controlling Shareholders, by means of a resolution of the General Assembly of shareholders or by the Company's management bodies in relation to:

- (a) modification of the Company's capital stock through the subscription of Shares;
- (b) approval of trading carried out by the Company with its own Securities, subject to the provisions of Clause 8.9.1 below;
- (c) distribution of dividends or interest on equity; and
- (d) transfer of the Company shareholding control.

8.7.1.1. In the events provided for above, the Controlling Shareholders, or the Chairman of the Board of Directors, in the event of a decision taken by the Board of Directors, shall notify the Investor Relations Officer, so that he can inform the Related Persons about the prohibition of trading of Securities issued by the Company.

8.8. Investment Plan

8.8.1. This Disclosure and Trading Policy does not allow the use of Investment Plans.

8.9. Treasury Operations

8.9.1. The Company may not trade their own Securities during the Trading Restriction Period, except in cases of acquisitions arising from the exercise of the stock option in accordance with the grant plan approved at the general assembly, or when it comes to granting Shares to Directors, employees or service providers as part of remuneration previously approved at the General Assembly.

9. MONITORING THE DISCLOSURE AND TRADING POLICY

9.1. It is incumbent upon the Investor Relations Officer to verify, in the event of a Material Act or Fact, that the rules and procedures set forth in this Disclosure and Trading Policy are properly observed, immediately reporting any irregularity to the Board of Directors, as well as to the internal audit area.

9.2. The accuracy and adequacy of the wording of the information disclosed to the market will be verified by the Investor Relations Officer.

9.3. In the event of any of the events provided for above, which imply the need to disclose a Material Act or Fact to be kept confidential, or a breach in the confidentiality of a Material Act or Fact prior to its market disclosure, the Investor Relations Officer will carry out internal investigations and diligence in the Company with the support of the internal audit and compliance areas, inquiring from the people involved, who must always respond to the requests for information, with the purpose of verifying the reason for the possible breach of the confidentiality of the information.

9.3.1. The conclusions of the investigation referred to in item 9.3 above shall be forwarded to the Board of Directors, for the appropriate measures, accompanied by any recommendations and suggestions for changes in this Disclosure and Trading Policy, which may avoid future breaches of confidentiality of confidential information.

9.4. The Chief Investor Relations Officer should monitor the trading of Securities, adopting procedures to ensure he/she is informed of the negotiations that occur in periods prior to the disclosure of a Material Act or Fact to the market, in order to identify any negotiations prohibited by the current legislation by people who were aware of such Material Act or Fact, reporting any irregularities to the Board of Directors and CVM.

10. VIOLATIONS AND SANCTIONS

10.1. Notwithstanding the applicable sanctions under current regulations and legislation, to be applied by the competent authorities, if any violation or breach of the terms and procedures established in this Disclosure and Trading Policy is identified, the Board of Directors shall take disciplinary measures that are applicable within the Company, which may result in removal from office or dismissal of the offender in the event of serious violation.

10.2. If the applicable measure falls within the legal or statutory competence of the General Assembly, the Board of Directors must summon a meeting to resolve the topic.

11. CHANGES TO THE DISCLOSURE AND TRADING POLICY

11.1. This Disclosure and Trading Policy may be amended in accordance with the resolution of the Board of Directors in the following situations:

- (a) when expressly determined to that effect by CVM;
- (b) given the modification of applicable legal and regulatory rules, in order to implement the necessary adjustments; and
- (c) when the Board of Directors, in the process of evaluating the effectiveness of the procedures adopted, identifies the need for changes.

11.2. Changes to the Company's Disclosure and Trading Policy must be notified to CVM and to the Market Entities by the Investor Relations Officer, as required by applicable legal and regulatory rules, as well as to the persons mentioned in the list in Clause 12.1 below.

11.3. This Disclosure and Trading Policy cannot be changed pending a Material Fact not yet disclosed.

12. GENERAL RULES

12.1. For the purpose of determining Related Persons, the Company's Investor Relations Director will be responsible for identifying the persons who have a commercial, professional or trust relationship with the Company, or who have access to Material Information not yet disclosed, and request that they adhere to this Policy.

12.2. The Company will maintain at its head office, available to the CVM, a list of the Related Persons and their respective qualifications, indicating their office or position, address and their CNPJ or CPF, updating it promptly whenever there is a modification.

12.3. The Company must send a copy of this Disclosure and Trading Policy to the Related Persons and, for the purposes of item 13 below, to the members of any body with technical or consultative functions created by statutory provision.

12.4 The Company must request that the Related Persons return the duly signed Term of Acceptance, in accordance with the Annex to this Policy, which will be filed at the Company's head office.

12.5. The communication about this Disclosure and Trading Policy, as well as the requirement to sign the instrument mentioned in the Appendix, to the Related Persons, will be made, as far as possible, before this person carries out any trading of Securities issued by the Company.

13. DISCLOSURE OF INFORMATION ON MANAGERS AND RELATED PERSONS

13.1. The Company, the Controlling Shareholder, all Directors, members of the Board of Directors, Members of the Fiscal Council, members of the Committees, including observers, and members of any other statutory bodies of the Company that may be created with technical or advisory functions, created with statutory functions, as well as any employees and third parties hired by the Company who have permanent or occasional access to relevant information, must notify the Company of the ownership of Securities issued by the Company and its Subsidiaries and any controlled companies, provided that they are publicly-held companies, and other related derivatives that they or any Close Relatives own, as well as the trading of such Securities. In the case of a Controlling Shareholder, this communication must cover the holder and the trading involving Related persons, according to the provisions in art. 30 of the Novo Mercado Regulation.

13.1.1. For the purposes of this article, the investment, redemption and trading of shares of investment funds whose regulations provide that they are publicly-held companies, equivalent to trading in Securities, issued by the Company and its controlled companies, provided that they are publicly-held companies whose portfolio of shares should be composed exclusively of Shares.

13.2. The communication required in the previous article must be made in accordance with the standard form, which must be sent by the Investor Relations Officer, by email to the Investors, (i) on the first business day after taking office; and (ii) within 5 (five) days after each trading of Securities, to the following address: ri@grupomadero.com.br.

13.3. The first communication of persons mentioned in item 13.1 must present a list containing the name and registration number in the Brazilian National Registry of Legal Entities or in the Brazilian National Registry of Individuals of Close Relatives.

13.4. The persons mentioned in item 13.1 must inform the Company of any changes in the information in the list of Close Relatives referred to in item 13.3 within a period of up to 15 (fifteen) days from the date of the change.

13.5. The Investor Relations Officer will also send a monthly e-mail requesting that the Directors, Fiscal Council Members, Committee members, including observers, , as well as members from any other body with technical or consultation functions created by statutory measures, must fill out and return this standard form to the Investors Relations Officer, with information on the initial position, Securities trades carried out and final balance of the last month, for purposes of mandatory disclosure of information to CVM and B3 on the 10th (tenth) of the following month.

13.6. The standard form has the purpose of, among other mechanisms, enabling the monitoring, by the Investor Relations Officer, of trading carried out.

14. Disclosure of Relevant Shareholding Changes

14.1. According to the terms of paragraph 1 of article 12 of CVM Resolution 44, and for the purposes of this Policy, "Relevant Trading" is considered to be the business or group of businesses, through which the direct or indirect participation of the Shareholders, be they direct or indirect controllers and shareholders who elect members of the Board of Directors or the Fiscal Council, as well as any individual or legal entity, or group of people, working together or representing a joint interest, who carry out relevant negotiations that exceed, be it higher or lower, the thresholds 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.

14.2. The Controlling Shareholders, directly or indirectly, and the 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 together or representing the same interest, who carry out must notify the Company immediately after a Relevant Trading.

14.3. The notification provided for in item 14.2 above shall include all information required in accordance with article 12 of CVM Resolution 44, including a) the number of shares, and securities, derivative financial instruments referenced in such shares explaining the amount and currency of the referenced shares; b) purpose for the stake and amount contained, if be the case, (except for item 14.5 below) a declaration that the trading did not have the objective to change the composition of the control or administrative structure of the company; c) name and qualification indicting the CNPJ/CPF number, when applicable, of the parties involved in the Relevant Trading; d) information on any agreement or contract regulating the exercise of voting rights or the purchase and sale of securities issued by the Company; and (e) if the shareholder is from abroad, name or title and CPF/CNPJ number of their representative in the country.

14.4. The obligations provided for in the items above also extend to the acquisition of any rights to the shares and other Securities issued by the Company, as well as the execution of any derivative financial instruments referenced to shares issued by the Company, even if without any provision for physical settlement, in compliance with the rules provided for in article 12, paragraph 3 of CVM resolution 44, which establishes the form of computation of derivative financial instruments for purposes of verifying the percentages indicated in item 14.1 above.

14.5. If the above-mentioned increases in the Company's shareholding or voting rights are intended to lead to a change in the Company's control or administrative structure, as well as in cases where it causes a demand for a takeover bid, subject to the terms from the applicable Regulation and of the Company's Bylaws, the

shareholder or group of shareholders will also have to provide and disclose this information to the market through the publication of announcements in the same communication channels normally used by the Company for its own disclosures.

14.6. The Investor Relations Officer is required to send, as soon as they are received by the Company, copies of such notifications to CVM and B3.

14.7. Any questions regarding the provisions of this Disclosure and Trading Policy, or the application of any of its provisions, must be forwarded directly to the Investor Relations Officer, who will provide the appropriate clarifications or guidance.

14.8. Unauthorized disclosure of Privileged Information, not publicly disclosed by the Company, is a harmful for the Company, its shareholders and the market in general, and is strictly prohibited.

14.9. Any person who violates the provisions of this Disclosure and Trading Policy will be subject to the procedures and penalties established by law and other regulations of the Company.

14.10. This Policy approved by the Board of Directors, is effective as of the date hereof and may only be modified by resolution of the Company's Board of Directors.

Ponta Grossa, July 13, 2022.

ANNEX

TERM OF ADHESION TO THE DISCLOSURE AND TRADING POLICY

I, [name], [nationality], [marital status], [profession], bearer of identity card [RG/RNE] No. [•] and CPF/ME under No. [•], residing at [address] , through this instrument, I formalize my adhesion to the Policy for the Disclosure of Information and Trading of Securities of Madero Indústria e Comércio S.A. corporation, headquartered in the city of Ponta Grossa, State of Paraná, at Avenida Vicente Nadal, No. 433, Cará-Cará, CNPJ/ME No. 13.783.221/0004-79 ("Company"), in accordance with the terms of CVM Resolution No. 44, of August 23, 2021, and approved at the Company's Board of Directors meeting on [•] [•] 2021.

Ponta Grossa, [•] [•], 2022.

Name:

Title: