



DOMO.VC
CODE OF ETHICS AND CONDUCT

This material was prepared by Domo Venture Capital Gestora De Ativos Financeiros e Valores Mobiliários Ltda. ("DOMO" or "Manager") and may not be copied, reproduced or distributed without its prior and express consent.

São Paulo, March 05, 2026

Table of Contents

1	Definitions	4
2	Message from the Executive Committee to DOMO's Employees	4
3	Compliance	5
3.6	Compliance Program	6
3.7	Regulation	6
3.8	Internal control structures and lines of defense	6
3.9	Compliance monitoring and testing	7
3.10	DOMO's Code of Ethics and Conduct	7
3.11	Compliance Responsibility	7
3.12	Compliance Officer - DOMO	7
3.13	DOMO: Code of Ethics and Conduct	7
4	Corporate Governance	8
4.4	Executive Committee	8
4.5	Compliance, Risk and AML/CFT Committee	8
4.6	Investment Committee	9
5	Employees' Responsibilities	9
5.1	Employees	9
5.2	Managers	9
5.3	Control Functions	10
6	Formal Training	10
7	Authority	10
7.1	Corporate Authority	10
7.2	Authority of each Employee	10
7.3	Individual Registration	12
7.4	Work visas and permits	12
8	Conflicts of Interest	12
8.1	General Principles	12
8.2	Employees' Responsibility	14
8.3	Transactions led by DOMO	14
9	Gifts and Entertainment	14
9.1	General Guidelines	14
9.2	Gifts	14
9.3	Entertainment	15
9.3.7	Prohibited Entertainment	16
9.4	Process for Reporting and Approving Gifts and Entertainment	16
10	External Activities	16

10.4	Reporting and Approval	16
11	Complaints, Whistleblowing Channel, Criticism and Legal Proceedings	17
11.1	Complaints	17
11.2	Whistleblowing Channel	17
11.3	Contact with Regulatory Bodies	18
11.4	Legal Proceedings	18
12	Sanctions	18
1.	ANNEX I	20

1 Definitions

1.1 For the purposes of this Code of Ethics and other DOMO Policies, the following terms shall mean:

- “Fiduciary Administrator”: institution engaged to provide fiduciary administration services to the Funds, pursuant to the legislation in force.
- “ANBIMA”: Brazilian Financial and Capital Markets Association.
- “Variable Income Assets”: shares, convertible securities (debentures), warrants, derivatives (exchange-traded or over-the-counter, including interest rate swaps, futures and options), share certificates and warrants, among other securities available in the Brazilian and international financial and capital markets as defined by Brazilian legislation and regulation or that of other jurisdictions, as applicable.
- “DOMO” or “Manager”: Domo Venture Capital Gestora De Ativos Financeiros e Valores Mobiliários Ltda.
- “Managed Portfolio(s)”: managed portfolios under the Manager’s management.
- “COAF”: Financial Activities Control Council.
- “Code”: DOMO’s Code of Ethics and Conduct.
- “Employee” or “Employees”: all those who hold an employment relationship, position, role, corporate, commercial or contractual relationship of a permanent nature with DOMO.
- “Private Credit”: financial assets representing non-sovereign debts or obligations.
- “CVM”: Brazilian Securities and Exchange Commission.
- “Portfolio Management Officer”: Officer responsible for the management of securities portfolios.
- “Distributor”: institution engaged to provide the service of distributing the Funds’ quotas, pursuant to the legislation in force.
- “Immediate Family Members”: spouses, partners, children and stepchildren, provided that they live in the same household as the Employee.
- “FIP”: private equity investment funds regulated by CVM Resolution No. 175, managed by the Manager.
- “Fund(s)”: investment funds managed by the Manager.
- “Inside Information”: material non-public information that may significantly influence market investors’ decision to sell or buy certain securities.
- “Investor(s)”: jointly, the quotaholders of the Funds and the investors of the Managed Portfolios.
- “PEP”: Politically Exposed Person, as defined in CVM Resolution No. 50/21.
- “Related Persons”: exclusive or non-exclusive investment funds, investment clubs, companies or investment vehicles predominantly controlled by the Employee or their Immediate Family Member, and also those over which they hold discretionary management power.
- “Compliance Policy”: Compliance and Internal Controls Policy
- “AML/CFT”: Anti-Money Laundering and Counter-Terrorism Financing
- “Internal Policy(ies)”: Any and all internal policies of DOMO, available at <https://domo.vc/politica-domo-invest-en/>.
- “SEC”: Securities and Exchange Commission.

2 Message from the Executive Committee to DOMO’s Employees

2.1 DOMO is proud of the reputation of its Employees and of its business, and makes every effort to keep that reputation crystal clear and intact.

- 2.2 We believe in the professional skills and knowledge of all our Employees to conduct the Manager's business in an ethical and responsible manner, prioritizing the Investors' interests and applying, in the performance of their duties, the care and dedication that diligent and upright persons apply in conducting their own personal affairs. All Employees earn and renew daily the trust placed in them by the Manager, demonstrating good sense and sound judgment in making decisions and carrying out their tasks, acting in accordance with the highest ethical standards, observing market rules, complying with the laws and regulations in force, and in line with the internal Policies established by DOMO.
- 2.3 All Employees have the obligation to know, understand and comply with this Code, DOMO's Compliance Policies, as well as DOMO's Internal Policies and the procedures defined for each area and position. However, the most important rule that everyone must always keep in mind is: always protect DOMO's integrity and your own; do not take the risk of harming such integrity even when you believe you may be contributing to achieving the objectives proposed by DOMO or benefiting the Investors' interests; and, further, never act in a way that suggests or leaves third parties with the impression that you may have acted improperly. When in doubt as to how to act, ALWAYS seek guidance from the Board of Officers, and especially from DOMO's Compliance area.
- 2.4 Integrity, capability, care and diligence are attributes of our reputation and, consequently, of our business.
- 2.5 The guidelines set out in this Code are intended to clarify how activities must be conducted by all DOMO Employees. The guidelines reflect DOMO's judgment as to practices that the Manager adopts or does not adopt, approves or does not approve. Accordingly, no matter how widely such a practice is used or seen in the market, DOMO's position reflects what DOMO's partners and Investors expect of the Manager's conduct. The Internal Policies and the conduct of our Employees are the pillar of our reputation and of the credibility our Investors have placed in us, and maintaining them is essential to carrying out the activity of securities portfolio management and the other activities performed by DOMO.
- 2.6 We expect you, Employees, to read and understand the guidelines set out in this Code and in the Manager's other Internal Policies, and, should any doubt arise, do not hesitate to contact your superior, DOMO's Compliance Officer, or any member of DOMO's Executive Board. After reading this Code, each Employee must digitally sign an Adhesion Term, which constitutes Annex I to this Code.

3 Compliance

- 3.1 The term Compliance derives from the English verb to comply, and means being in conformity (with rules, standards and procedures).
- 3.2 Compliance risk is, for DOMO, the risk of harm to DOMO's reputation, integrity and ability to conduct its activities normally, arising from non-conformity with the standards, rules and procedures in force. Accordingly, DOMO has implemented internal controls and Compliance activities within its structure. The Compliance area combines these two functions, and its main focus is to ensure compliance with regulatory standards and internal processes, preventing and controlling the risks involved in DOMO's activities, as further detailed in the Compliance, Internal Controls and Compliance with CVM Resolution 21/21 Policy.
- 3.3 Through Compliance controls, any deviation from DOMO's policies is identified and corrected.

- 3.4 Should any deviation be identified, the Compliance area must assess the existing risks and implement the control mechanisms necessary to avoid or mitigate risks to the Manager's Investors.
- 3.5 DOMO's Executive Committee is fully committed to preserving DOMO's integrity, reputation and ethical standards.

3.6 Compliance Program

- 3.6.1 DOMO maintains a structured Compliance program designed to ensure observance of the applicable legislation and regulation, self-regulation rules, as well as the internal policies and ethical principles governing its activities.
- 3.6.2 The purpose of the Compliance program is to prevent, detect and remediate non-compliance risks, protect DOMO's reputation and promote integrity in the conduct of its business.
- 3.6.3 The Compliance Officer shall act with functional independence, having unrestricted access to the information, documents, systems and employees necessary to perform their duties, reporting directly to DOMO's Executive Committee.
- 3.6.4 No area may restrict, limit or interfere with Compliance's activities, and its technical autonomy is assured.

3.7 Regulation

- 3.7.1 In carrying out the activity of securities portfolio management, faithful compliance with the standards and regulations in force must be assured, as determined by the CVM and ANBIMA, including, but not limited to, the rules set out in CVM Resolution No. 21/21 and in ANBIMA's Code of Ethics.
- 3.7.2 All DOMO Employees must know and comply with this Code and the Manager's other Internal Policies, be aware of the regulatory prohibitions/restrictions imposed on the Manager, and comply with the rules, procedures and internal controls established by the CVM and ANBIMA.
- 3.7.3 In summary, but without limitation, all Employees must (i) act so that DOMO carries out its activities with good faith, transparency, diligence and loyalty to its Investors; (ii) perform their duties seeking to meet their Investors' investment objectives, and avoid practices that may harm the fiduciary relationship maintained with their Investors; (iii) guide the performance of activities by the principles of freedom of initiative and free competition, avoiding the adoption of practices characterizing unfair competition and/or inequitable conditions, respecting the principles of free negotiation; (iv) adopt conduct consistent with the principles of moral and professional integrity; (v) faithfully comply with the Funds' bylaws or the agreements entered into with Managed Portfolio Investors. Employees shall receive periodic training, whenever the Compliance area deems it necessary, appropriate to their level of responsibility, in order to adhere to the rules and adequately perform their duties at DOMO.

3.8 Internal control structures and lines of defense

- 3.8.1 DOMO's internal control structure comprises three different lines of defense, which are based on the independent and integrated action of the following structures:

a) First Line of Defense – administrative and business areas: comprised of DOMO's own administrative and business areas; accordingly, each Employee is responsible for identifying,

managing and mitigating the compliance risks inherent to their activities, implementing preventive controls in the processes under their responsibility.

b) Second Line of Defense – internal controls, risk management and Compliance: comprised of the Risk Management and Compliance area, responsible for identifying, interpreting and consolidating the legal and regulatory standards applicable to DOMO's activities, converting them into policies and internal controls. It must also guide Employees as to the application of and compliance with such standards, promoting, when necessary, adjustments and action plans to mitigate non-compliance risks.

c) Third Line of Defense: comprised of internal or external audit, where applicable, responsible for carrying out independent assessments of the effectiveness of controls, processes and of the Compliance Program, whenever necessary.

3.9 Compliance monitoring and testing

- 3.9.1 Compliance may carry out periodic monitoring and adherence testing in order to verify compliance with this Code, the internal policies and the applicable legislation.
- 3.9.2 Monitoring may include documentary analyses, process reviews, interviews, sample testing and ongoing follow-up of sensitive activities.
- 3.9.3 The Compliance Officer must prepare periodic reports on the tests, when carried out, containing conclusions, recommendations and any action plans.

3.10 DOMO's Code of Ethics and Conduct

- 3.10.1 This Code defines the scope, responsibility and the organizational and operational form of the Compliance function at DOMO and in the businesses in which we are involved. It clearly and thoroughly establishes Compliance responsibility at all levels of DOMO's structure.

3.11 Compliance Responsibility

- 3.11.1 Ultimate responsibility for Compliance rests with DOMO's Executive Committee. As provided by regulation, the Compliance Officer leads these activities, is independent in their decisions, and their approval is required in all matters relating to Compliance at the Manager.

3.12 Compliance Officer - DOMO

- 3.12.1 As provided in the Compliance, Internal Controls and Compliance with CVM Resolution No. 21/21 Policy, the Manager's Compliance Officer reports directly to the Executive Committee, has full authority over the implementation of DOMO's Compliance Program and is familiar with capital markets legislation and regulation.

3.13 DOMO: Code of Ethics and Conduct

- 3.13.1 DOMO's Executive Committee believes that this Code, together with the Manager's other Internal Policies, sets out the minimum Compliance rules that are essential to carrying out our activity appropriately.
- 3.13.2 The document that follows sets out each principle of the Compliance Policy that must be observed by DOMO's Employees.

3.13.3 In this Code, references to “Compliance” mean DOMO’s Compliance rules, or the area responsible for Compliance at DOMO.

4 Corporate Governance

4.1 DOMO has 3 (three) institutional Committees that advise the Board of Officers. Such Committees meet periodically to address matters relevant to the performance of the Manager’s activities, in accordance with their respective scopes of action.

4.2 As a general rule, matters submitted for resolution within the Committees shall be decided by a majority of the votes of those present, unless otherwise expressly determined. In the event of a potential conflict of interest involving any member of the institutional Committees, such member must expressly abstain from voting on the relevant matter.

4.3 Minutes must be drawn up for the Committee meetings, which may be in summary form, and shall be filed at DOMO’s head office.

4.4 Executive Committee

4.4.1 The Executive Committee is composed of its 03 (three) Managing Partners, and other employees and/or partners may be invited to participate on an ad hoc basis as listeners or contributors.

4.4.2 The Executive Committee meets monthly, or whenever necessary, upon call by any of its members. The Executive Committee is responsible for, at least:

- Reviewing adherence to the Manager’s annual business plan;
- Discussing matters related to the Manager’s strategy, its definitions, changes, and manner of implementation;
- Analyzing the Manager’s economic and financial performance, as well as that of its Funds and other products; examining the liquidity of the Manager and of its Funds, seeking to meet day-to-day needs whenever necessary;
- Discussing the admission of new Investors and/or new business, approving them only in accordance with the quorum approved in its Articles of Association and Partners’ Agreement; provided that, for matters related to Compliance, the affirmative vote of the Compliance Officer is required, for matters related to Risk Management, the affirmative vote of the Risk Officer is required, and for matters related to AML/CFT, the affirmative vote of the AML/CFT Officer is required; and
- Assessing the individual performance of Employees and making hiring or contract termination decisions.

4.4.3 The Executive Committee is the collegiate body with the highest decision-making authority at DOMO and has autonomy to supervise all of the Manager’s activities, Employees and other Committees. Therefore, the members of this Committee may request and access any information and documents owned by the Institution and its Funds, including the minutes of the meetings of the other Committees.

4.4.4 It being understood that, in resolutions on matters in which any of its members has a conflict of interest, such member shall be barred from voting.

4.5 Compliance, Risk and AML/CFT Committee

- 4.5.1 The Compliance, Risk and AML/CFT Committee is composed of 01 (one) Compliance Officer, 01 (one) Risk Officer and 1 (one) AML/CFT Officer, and the Compliance Officer may be advised by external counsel, and other Employees may be invited to participate on an ad hoc basis as listeners or contributors.
- 4.5.2 This Committee meets at least every four months, and whenever necessary, upon call by any of its members.
- 4.5.3 The Compliance, Risk and AML/CFT Committee shall have full autonomy to perform its duties, detailed in the Manager's Compliance Policy, AML/CFT Policy, Internal Controls and Compliance with CVM Resolution No. 21/21 and the Policy for the Prevention of Money Laundering, Terrorism Financing and the Financing of the Proliferation of Weapons of Mass Destruction ("AML/CFT Policy"). The matters addressed by this Committee are strictly confidential.
- 4.5.4 Should any member deem it necessary or convenient, they may submit any matter within this Committee's remit for the consideration or resolution of the Executive Committee.

4.6 Investment Committee

- 4.6.1 The Investment Committee is composed of DOMO's 03 (three) Managing Partners. Other Employees may be invited to participate on an ad hoc basis as listeners or contributors.
- 4.6.2 This Committee meets at least monthly, and whenever necessary, upon call by any of its members.
- 4.6.3 The purpose of the Investment Committee shall be, at least:
 - To guide the analyst team in seeking opportunities compatible with the Funds under management;
 - To assess investment options, their risk/return relationships, and their adherence to the bylaws of each Fund;
 - To assess divestment opportunities in Target Assets of the Portfolio; and
 - To request additional information in order to mitigate risks identified in the analysis of each investment.

5 Employees' Responsibilities

5.1 Employees

- 5.1.1 Every DOMO Employee is individually responsible for performing their work with sound judgment and high ethical standards, observing CVM Resolution No. 21/21, which governs securities management, and other regulations in force that discipline and regulate our activities, and always in accordance with DOMO's Internal Policies.
- 5.1.2 Every Employee is also responsible for alerting the Compliance Officer, the Risk Officer and, where applicable, the Executive Board, to potential violations, or actual breaches, of laws, regulations, self-regulation, internal rules, or practices that depart from the good practices set out in this Code and/or in the Internal Policies, that may come to their knowledge.

5.2 Managers

- 5.2.1 The Managers of each area are responsible for ensuring that adequate control systems are effective and functioning properly in their respective area. Individually, each Manager is responsible, in addition to the duties provided for in the applicable regulation, for the day-to-day supervision of their work team, and for maintaining ethical standards at DOMO.

5.3 Control Functions

- 5.3.1 Specific control functions, such as Compliance and Risk, are delegated to DOMO professionals qualified and authorized to perform such functions, who are responsible for assisting the Executive Board in establishing an efficient and effective environment for business development. These control functions do not replace the management of the Executive Board and of the Compliance Officer, nor the individual supervision by each Manager of their direct Employees.

6 Formal Training

- 6.1 At the beginning of the professional relationship, DOMO conducts initial training for each new Employee, on which occasion topics covered by this Code and the Manager's other Policies are addressed, such as ethical principles, rules of conduct, personal investments, information confidentiality rules, anti-corruption, AML/CFT, among other relevant policies.
- 6.2 In addition to the Employee's initial training, DOMO has a periodic refresher program for all Employees, under the responsibility of the Compliance area. Refresher training must take place at least annually, or whenever there is a change in the guiding assumptions of the Manager's Compliance program as a result of the entry into force of laws, instructions and/or any normative act of regulatory and/or self-regulatory bodies that substantially impacts the conduct of DOMO's activities.
- 6.3 All training sessions shall be scheduled with reasonable advance notice and Employees shall be informed by means of an electronic invitation to be sent by the Compliance area.
- 6.4 It is the duty of every Employee to attend mandatory training sessions, and they must justify their absence to the Compliance area.
- 6.5 A copy of the attendance list and of any certificates must be kept on file at DOMO's head office by the Compliance area, for a period of no less than 5 (five) years, and may be made available to regulatory and self-regulatory bodies whenever requested or necessary.

7 Authority

7.1 Corporate Authority

- 7.1.1 DOMO's Managing Partners and Executive Officers must ensure the appropriate structure for maintaining the authorization to carry out the activity of securities portfolio management granted by the CVM, pursuant to CVM Resolution No. 21/21, and any other licenses/authorizations that may be necessary for DOMO to carry out its activities. They must also ensure that any new business area and/or product developed for the expansion of DOMO's activities obtains the appropriate licenses/authorizations, procedures and controls, if necessary, prior to the commencement of its activities.

7.2 Authority of each Employee

- 7.2.1 You, Employee, must be aware of the representativeness of your position/role at DOMO and the Funds, and must also be familiar with the regulatory environment and comply with all

rules and regulations in force, and be aware of the limits of responsibility and authority for the performance of your role, representing DOMO and/or the Funds managed by it. You must also be familiar with DOMO's hierarchy, especially who reports to you and to whom you report.

7.3 Individual Registration

- 7.3.1 You, Employee, must ensure that you are qualified, and evidence the authorization granted by Regulatory and Self-Regulatory Agents/Bodies, where applicable, to perform your duties at DOMO.
- 7.3.2 Should your duties become necessary in different jurisdictions, you are responsible for consulting your superiors in advance and checking the status of your qualifications to perform such duties. If you are not certain about your status before the Regulatory Agent, consult your superior and the Compliance Officer before starting any business activity, whether or not related to securities portfolio management.

7.4 Work visas and permits

- 7.4.1 Where appropriate, you, Employee, must ensure that you hold all approvals necessary to perform your work and duties, including work visas, Regulatory Agent licenses, among others. DOMO's Human Resources area must, when requested, provide all guidance so that you, Employee, are in full compliance with your obligations.
- 7.4.2 The Employee undertakes to promptly inform the Compliance area whenever they obtain or enter into a process to obtain a new certification or license before Regulatory Bodies.

8 Conflicts of Interest

8.1 General Principles

- 8.1.1 Employees must be diligent and exercise independent professional judgment when conducting investment analyses, when promoting DOMO's services and when participating in other professional activities, especially when representing the Manager.
- 8.1.2 In accordance with internal policy, DOMO does not carry out or prospect business that could potentially conflict with the principles and interests of DOMO and of its Investors.. Should conflicts of interest arise prior to the formalization of investment transactions or securities trading, DOMO's preference is to decline to carry out the transaction.
- 8.1.3 Should conflicts of interest or ambiguous conduct arise after the execution of an agreement or the formalization of the transaction, DOMO and its Employees shall use their best efforts to afford fair and appropriate treatment to the parties involved.
- 8.1.4 DOMO's Employees must be aware of the general principles governing securities management, the other activities performed by DOMO and the Investor's profile, keeping business, transactions and material information in absolute confidence. In addition, they must avoid agreeing to or formalizing any service, contract, advisory, recommendation or acquisition of securities that has the potential to cause conflicts of interest between DOMO, its Employees, its Investors and other parties involved.
- 8.1.5 The following are some examples, without limitation, of situations that may give rise to conflicts of interest:
 - i. Involvement in activities that interfere with the Employee's ability to devote the necessary time and attention to the responsibilities of the work performed at the Manager;

- ii. Involvement in activities that enable the use of inside information received by the Employee by reason of the position held at the Manager;
 - iii. The Employee has private involvement in businesses that may compete with the Manager's activities;
 - iv. The Employee appropriates for themselves investment opportunities that could form part of the Manager's investment portfolio;
 - v. Information to which the Employee has access by virtue of their position is, as a rule, considered confidential and susceptible to conflict. The Employee must always implement adequate internal controls and compliance measures and adopt a conservative stance regarding the information to which they have access, preserving its confidentiality and ensuring that it will not be misused;
 - vi. The Manager's Funds assessing and/or investing in a company in which Employees have some type of personal interest, including but not limited to direct equity interest and/or holding a management position in such company;
 - vii. The exercise of voting rights where it involves, including but not limited to, (a) events that influence the Manager's decision-making; (b) different funds managed by distinct business lines at the Manager; and (c) a fund in which an Employee has an investment or interest in the company that is the subject of the vote;
 - viii. Related-party transactions, which may involve different funds managed by distinct business lines at the Manager, and/or Employees, and result in prices that are detrimental to one of the parties; and
 - ix. Benefits in dealings with someone with whom the Employee has a personal relationship.
- 8.1.6 At the beginning of their professional relationship with DOMO, all Employees must declare in writing any potential conflict of interest that may exist between their professional and private life, which shall be recorded by the Compliance area for monitoring, where applicable.
- 8.1.7 The likely actions consistent with the Manager's values and the expected results are:
- i. Taking ownership of mistakes made and promptly reporting them to the immediate superior;
 - ii. Questioning actions that are contrary to the values and principles established in this Code;
 - iii. Presenting suggestions and constructive criticism with the aim of improving the quality of the work and the Manager's results;
 - iv. Reporting to the Compliance Officer possible attempts at bribery, sabotage or illegal conduct or conduct inconsistent with the Manager's ethics;
 - v. Reporting to the Compliance Officer, whenever applicable, situations that must be reported to COAF; and
 - vi. Informing the Compliance Officer in advance of any situations that may constitute potential conflicts of interest.
- 8.1.8 Furthermore, all Employees, partners and officers shall inform the Compliance Officer of any equity or functional interests they hold in other companies, so that the Compliance Officer may take any additional measures appropriate to mitigate potential conflicts of interest in relation to each company.
- 8.1.9 Depending on the potential conflict reported, the Compliance Officer may bring the matter to the Compliance, Risk and AML/CFT Committee, which may, considering the circumstances of the case and at its reasonable discretion, agree to the temporary non-compliance with certain rules, upon the establishment of a detailed action plan for the appropriate handling of the situation and the mitigation of potential conflicts of interest.

8.2 Employees' Responsibility

- 8.2.1 All Employees have the duty to recognize, avoid and manage conflicts of interest that may arise in DOMO's operations. Employees must know exactly for whom they are acting in each of DOMO's business areas and which interests they have a fiduciary obligation to defend. Consequently, full transparency must be given to counterparties, making the interests clear, and verifying whether there is any perception of discomfort on the part of Investors, partners or service providers regarding the conduct of securities management and the other activities performed by DOMO.
- 8.2.2 All Employees must use their best efforts to identify and address conflicts that may arise between DOMO's areas, between DOMO and its Investors, or between two or more DOMO Investors.
- 8.2.3 DOMO's Employees must not take or defend positions in which their personal interests influence their actions or influence the judgment of third parties, in an attempt to obtain a beneficial/advantageous result for themselves, regardless of the outcome for DOMO, its Investors and other parties involved.
- 8.2.4 When the DOMO Employee is performing their obligations towards Investors, any recommendation/advice provided to Investors must be guided solely by the interest of DOMO's Investors. Any personal bias of the Employee, arising from personal interests, or from DOMO's interests, that may conflict with the Investors' interests must be disregarded when the Employee acts as the Client's representative.
- 8.2.5 DOMO expects its Employees to bring to the Compliance Officer's attention any risks identified and/or concerns regarding certain business practices conducted by the Manager or by any of its Employees.

8.3 Transactions led by DOMO

- 8.3.1 Transactions involving the release of funds to Employees' personal accounts are strictly prohibited.

9 Gifts and Entertainment

9.1 General Guidelines

- 9.1.1 You, Employee, must not accept, request or offer any form of incentive, such as gifts, benefits or favors that may affect the performance of your obligations in carrying out your duties at DOMO.
- 9.1.2 Accepting or giving gifts, accepting or offering benefits and favors beyond the limit formally permitted by the Manager, or closing deals on terms more favorable than those normally offered, is strictly prohibited. Any breach of this principle, detailed below, is considered serious misconduct.

9.2 Gifts

- 9.2.1 Gifts whose value does not exceed the equivalent of R\$200.00 (two hundred reais) may be accepted and offered, provided that they are given or received, involving the same persons, at a normal and acceptable frequency (e.g., once per quarter). Any gift offered or received exceeding this amount must be reported to the Compliance area, in the manner described in item 9.4 below.

- 9.2.2 Any and all gifts received with a value above R\$200.00 (two hundred reais) and below R\$500.00 (five hundred reais), and/or at a frequency greater than once per quarter, must be reported to the Compliance Officer by the Employee who received it, for a decision as to its disposition, which may be, for example: return, donation, and/or raffle among all Employees, or a group of Employees of a given area, at the discretion of DOMO's Executive Board, together with the Compliance Officer.
- 9.2.3 Any and all gifts received with a value above R\$500.00 (five hundred reais) must be delivered by the Employee who received it, for return, donation, or, if the Compliance Officer approves, for a raffle among all Employees, or a group of Employees of a given area, at the discretion of DOMO's Executive Board.
- 9.2.4 The following may not be accepted or offered:
- Cash or cash equivalents;
 - Donations of any kind;
 - Non-monetary services; and
 - Any and all gifts from government agents, regulatory and self-regulatory bodies, in any amount.
- 9.2.5 Gifts must not be offered or accepted under any circumstances outside the work environment (e.g., at the Employee's home); if any gift is sent to the Employee's home, the Employee must notify and deliver it to the Compliance Officer.
- 9.2.6 Employees are expressly prohibited from requesting gifts or souvenirs from any third parties, even if of a value lower than that referred to above, whether for their own benefit or for the benefit of third parties.

9.3 Entertainment

- 9.3.1 The following are considered entertainment: meals, events, trips, concerts and shows, held during or outside working hours, involving business partners, suppliers or Investors of DOMO, where the host's presence can be evidenced.
- 9.3.2 Tickets to events of any nature offered to DOMO Employees, or offered by DOMO Employees to third parties, without the host's presence are, in fact, gifts and must follow the guidelines specified in the item above.
- 9.3.3 As with the item on Gifts, the most important thing is that the Entertainment does not create an expectation, in the guest or host, of special/preferential treatment, particularly with respect to contractual, operational and documentary conditions.
- 9.3.4 Remember: the most important thing is to avoid any and all situations that have the potential to create a conflict of interest.
- 9.3.5 Due to the nature of its business, DOMO does not set limits on entertainment amounts, but the Compliance area must always be consulted prior to offering or accepting it when the expenses per person exceed R\$ 500.00 (five hundred reais).
- 9.3.6 The acceptance or offering of entertainment must occur only with a clear business rationale, where the presence of the Manager's Employees is relevant to its reputation and to maintaining a good relationship with its Investors.

9.3.7 Prohibited Entertainment

9.3.7.1 The following are not appropriate events and are therefore prohibited under this policy and must be immediately declined:

- Entertainment that may be considered excessive in the context of the business occasion;
- “Adult” entertainment or any type of event involving nudity or obscene behavior;
- Accepting entertainment knowing that the person offering it is not permitted to do so;
- Entertainment offered, on an exclusive basis, by or to public agents, agents of regulatory and self-regulatory bodies; and
- Events open to the public or to other market participants are not covered by this prohibition and must follow the approval standard set out in item 9.4 of this Code.

9.4 Process for Reporting and Approving Gifts and Entertainment

9.4.1 Whenever gifts are received/sent or an entertainment invitation is extended, regardless of the nature of the event (meals, football matches, car races, conferences, concerts, shows, etc.), the Employee must request written authorization from their immediate superior. Upon receiving the authorization, they must forward it to the Compliance area with, at a minimum, the data and information listed below:

- Description of the Gift/Entertainment;
- Name of the company and of the Employee who delivered/received the Gift or who extended the invitation;
- Date;
- Description of the business relationship and any circumstances of the delivery/receipt or of the invitation;
- Name of the DOMO Employee who received/sent the Gift/invitation, area of activity and name of the immediate superior; and
- Copy of the express authorization of the immediate superior, in the case of entertainment.

9.4.2 The Compliance area shall analyze the case and authorize or not the Employee’s receipt/participation, in cases where the value of the gift or entertainment exceeds the amounts stipulated in this Code.

10 External Activities

10.1 External activities that have the potential to represent conflicts of interest or risks to the Manager must be avoided by Employees.

10.2 In carrying out an external activity, the Employee may incur certain risks, such as creating conflicts of interest for the Manager, misleading investors, in addition to devoting their time to activities unrelated to their role at the Manager.

10.3 External activities or interests are characterized as those of a professional or economic nature, conducted by Employees in companies other than the Manager, whether or not remunerated, and conducted during or outside normal working hours.

10.4 Reporting and Approval

10.4.1 The following activities to be carried out by Employees are subject to prior reporting to and approval by the Compliance Officer:

- Holding management positions or other senior positions in any companies, including NGOs, participation in Boards of Directors or Audit Boards of any companies, bodies, trade associations or companies, including financial institutions;
- Running for political office, as well as holding positions linked to politicians or political parties, even if by appointment;
- Maintaining, or even applying to establish, employment relationships with other institutions, companies or persons; and
- Providing consulting or services of any nature, such as legal consulting or participation in lectures..

10.4.2 The Compliance Officer may deny approval of external activities whenever they understand, at their sole discretion, that they represent a risk or conflict of interest. Likewise, the Compliance Officer may request the immediate termination of external activities by any of the Employees.

10.4.3 Employees must inform the Compliance Officer of any and all changes occurring in previously approved external activities, as well as request approval for any and all new external activities, even if at the same institution, as required by this policy.

11 Complaints, Whistleblowing Channel, Criticism and Legal Proceedings

11.1 Complaints

11.1.1 DOMO must ensure its Investors the right to make complaints and criticisms, which shall be duly analyzed, reported to the Executive Board and answered appropriately, always aiming to improve Investor service and enhance the services provided by DOMO.

11.1.2 All written complaints must be formally analyzed, within the scope of the regulation in force, and it must be verified whether there were any failures by DOMO in serving the Investor, in breach of the rules in force.

11.1.3 Any complaint that puts DOMO's integrity or reputation at risk must be reported immediately to the Executive Board and to the Compliance Officer, via the email dir_compliance@domo.vc and/or through DOMO's Whistleblowing Channel.

11.1.4 Generally, minor complaints or minor criticisms that are not materially relevant, and provided they can be easily resolved, must be reported to the Executive Board within the scope of the periodic meetings, so that statistical control is maintained over the number of such complaints and the level of Investor satisfaction with DOMO's responses.

11.1.5 Materially relevant complaints, whether due to their potential financial risk or potential damage to DOMO's reputation, must be immediately reported to the Compliance Officer and to the Executive Board. No Employee should handle the search for a solution to a complaint about the service provided alone, without guidance from a superior.

11.2 Whistleblowing Channel

11.2.1 DOMO provides a Whistleblowing Channel intended for receiving reports of irregular, unlawful or unethical conduct, or conduct that violates this Code, the internal policies or the applicable legislation. Any Employee who identifies a suspicious occurrence may file a report through the Compliasset platform ("Whistleblowing Channel").

11.2.2 The Whistleblowing Channel ensures the confidentiality of the information, the anonymity of the whistleblower, when requested, and protection against any form of retaliation.

11.2.3 Any attempt at reprisal against good-faith whistleblowers or against employees who cooperate with internal investigations is prohibited.

11.3 Contact with Regulatory Bodies

11.3.1 Any non-routine contact with the CVM, other regulatory bodies, or self-regulatory entities, or any institutional contact of DOMO, that may indicate criticism, a complaint, or information harmful to DOMO's image and that may damage its reputation, must be immediately reported, in writing, to the Executive Board and to the Compliance Officer.

11.4 Legal Proceedings

11.4.1 Any legal proceeding against DOMO, whether verbal or written, must be immediately brought to the attention of the Compliance area and the Executive Board. No response may be given without the prior consent of DOMO's Executive Board and Compliance Officer. If you receive any document, summons or legal communication addressed to DOMO, you must immediately notify DOMO's Compliance area and Executive Board. Such documents are generally URGENT in nature and must be treated as such.

12 Sanctions

12.1 Any violation of the rules and/or procedures set out in this Code, DOMO's other Policies or even of the legislation in force, whether in whole or in part, shall result in an investigation of the matter by the Manager and, where applicable, in the application of any penalties that may be necessary.

12.2 Recourse to the internal disciplinary sphere is not intended to limit the implementation of appropriate legal measures to remedy any damage caused to DOMO or its Investors, who may take the appropriate measures for any compensation, including monetary compensation, where applicable.

12.3 Violations shall be investigated by the Compliance Officer, who must inform the Executive Board of the occurrence. The Board, in turn, shall call an extraordinary meeting to assess the conduct and apply a penalty, where applicable. The penalty may range from a warning, fines (in cash or direct loss of benefits or of assessment points for variable compensation purposes), suspension, removal or dismissal of the Employee for cause, or even termination of the corporate relationship in the case of partners.

12.4 The penalties shall be recommended by the Compliance Officer to the Board, which shall take into account, among other factors, any voluntary disclosure made by the infringing Employee, the timeliness and usefulness to DOMO of the disclosure made, and the Employee's willingness to cooperate in adopting the measures necessary to mitigate the effects of the violation, as well as the seriousness and any recurrence of the violation.

12.5 Should any member of the Board be involved in the violation or suspected violation of the rules and/or procedures set out in this Code, the Manager's other Policies or even of the legislation in force, such member may not participate in the meeting to be conducted by the Board to investigate the facts and determine a penalty, if applicable. In this case, if necessary, an Employee, preferably one who is not a direct subordinate of such Board member, may be called to participate in the meeting, in replacement of the disqualified Board member.

- 12.6 The Compliance area must maintain a file containing a history of all information relating to the investigation of violations, including a description of the violation committed by the Employee and of the penalty determined by the Board, for a period of no less than 5 (five) years.

1. ANNEX I

**ADHESION TERM TO
DOMO'S CODE OF ETHICS AND CONDUCT.**

I, _____, enrolled with the CPF under No. _____, in the capacity of _____ (position) of DOMO,

By means of this instrument, I attest that I have received, read and understood DOMO's Code of Ethics and Conduct and confirm that I have full knowledge of all the guidelines and procedures set out herein.

I undertake to comply with it in full and to cause Persons Related to me and my Immediate Family Members to comply with it, as applicable to them, confirming my awareness of the sanctions applicable to each case of violation of the Policies set out in this Manual.

Date:

Signature: