



CONTINUED EMPLOYEE CERTIFICATION POLICY

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1 Definitions

1.1 For the purposes of this DOMO Policy, the following definitions shall apply:

- "Fiduciary Administrator": institution contracted to provide the fiduciary administration service to the Funds, under the terms of the legislation in force.
- "ANBIMA": Brazilian Association of Financial and Capital Markets Entities.
- "Variable Income Assets": shares, convertible securities (debentures), warrants, derivatives (traded on the stock exchange 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 the laws and regulations of Brazil or other jurisdictions, as applicable.
- "DOMO" or "Manager": DOMO Gestora de Ativos Financeiros e Valores Mobiliários Ltda. Venture Capital
- "Managed Portfolio(s)": managed portfolios managed by the Manager.
- "COAF": Council for the Control of Financial Activities.
- "Code": DOMO's Code of Ethics and Conduct. of
- "Employee" or "Collaborators": all those who have an employment relationship, position, function, corporate, commercial or contractual relationship on a permanent basis with DOMO.
- "Private Credit" means financial assets representing non-sovereign debt or bonds.
- "CVM": Securities and Exchange Commission.
- "Managing Director": Officer responsible for the administration of securities portfolios. before the CVM
- "Distributor": institution contracted to provide the service of distribution of Funds' shares, under the terms of the legislation in force.
- "Direct Family Members": spouses, partners, children, stepchildren, as long as they live in the same household as the Employee.
- "FIP": equity investment funds regulated by the CVM Resolution No. 175/2022 and other applicable rules, managed by the Manager.
- "Fund(s)": FIPs managed by the Manager.
- "Inside Information": relevant non-public information that may significantly influence the decision of market investors to sell or buy certain securities.
- "Investor(s)": Funds shareholders
- "PEP": Politically Exposed Person, as defined in CVM Resolution 50.
- "Related Persons": exclusive or non-exclusive investment funds, investment clubs, companies or investment vehicles majority-controlled by the Employee or his/her Immediate Relative, and also under which they hold discretionary management power.

2 Objective

2.1 This Policy is part of DOMO's Compliance and Internal Controls Program and aims to ensure that Employees who perform regulated activities continuously meet certification

requirements, with governance, traceability, segregation of duties and mitigation of legal, regulatory and reputational risks.

- 2.2 The purpose of this Policy is to establish the procedures that must be followed by DOMO and its Employees, in order to seek permanent compliance with the ANBIMA Code of Continued Certification ("ANBIMA Code"), in particular the control of the required certifications and their respective deadlines.
- 2.3 This Policy observes, among others, the provisions of the CVM Resolution No. 21/2021 and CVM Resolution No. 175/2022, the ANBIMA Code of Continuous Certification, DOMO's Code of Ethics and Conduct and other CVM and ANBIMA rules applicable to the Manager's activities.

3 Responsible Areas

- 3.1 The need to hire a certified professional is demanded by the manager of the area eligible for certification ("Eligible Area") and informed to the administrative and *Compliance area*.
- 3.2 The *Compliance area* and the General Director of Management will adopt the formal control procedures, subject to verification, related to obtaining and maintaining the certification or dismissal/exemptions pertinent to all its professionals, in accordance with the specific guidelines issued by the ANBIMA Code, as well as whether the control of admission and dismissal of Employees is working properly and, also, whether such events are being properly updated in ANBIMA's database, when applicable.
- 3.3 The Compliance area will also be responsible for monitoring the expiration date of the certification of those Employees who need it to carry out their activity.
- 3.4 This monitoring will also be carried out through the respective events of *DOMO's* Compliance system (*Compliasset system*).

4 Eligible Areas

- 4.1 Among the various areas of DOMO, the management area is the only one with a professional eligible for certification for performing the activity of professional management of third-party resources with discretionary investment (purchase and sale) of the assets that are part of the FIPs' portfolios ("Eligible Activity").
- 4.2 Thus, the minimum certification required for these professionals is the CGE, according to the ANBIMA Code.
- 4.3 Analysts who carry out activities in support of management areas - respecting DOMO's segregation of activities policy - are not eligible for certification because they do not perform the activities mentioned above.

- 4.4 The other areas of DOMO, despite not being directly eligible for certification, and certified professionals and/or those with exemptions and exemptions, will be duly identified, and this control will be done at the time of new hires; and/or annually; and/or whenever the *(i), (ii), (iii) Compliance* area deems necessary.
- 4.5 If DOMO operates in other areas that require certification, this Policy must be amended in order to include this area among the Eligible Areas as well as the respective new Eligible Activity.

5 Procedure for Identifying Certified Professionals

- 5.1 In defining the need for a new member and/or replacing a certified employee, the person responsible for the contracting area must inform the *Compliance* area if there is a need for a certified professional.
- 5.2 If so, this aspect should already be taken into account in the screening of candidates. If not, when any Employee is hired, it must be questioned whether he/she holds any certification or waiver/exemption before ANBIMA.
- 5.3 If the new Employee is certified or has a waiver/exemption, even if for an ineligible position, he or she must be updated with the ANBIMA Database, in accordance with the applicable rules. Any exceptions regarding eligibility, exemption or certification requirement must be previously evaluated by the Compliance area.
- 5.4 All acts related to the certification, dismissal, exemption, updating, leave and return of Employees must be documented and kept in electronics files, ensuring traceability and the Compliasset system can be used as directory of the Files.

6 Licensing, Change of Employee between Eligible and Non-Eligible Area

- 6.1 Based on control carried out by DOMO, the *Compliance* area will map all certified or dismissed/exempt Employees, their areas of activity and the need for certification.
- 6.2 In the event of a change of area of a certified professional to an area not eligible for certification, the director responsible for the eligible area must maintain a duly certified substitute for the respective activity.
- 6.3 In the event that a non-certified professional applies for an eligible position, he or she must seek eligible certification before taking up that position.
- 6.4 The monitoring of all the above procedures is the responsibility of the *Compliance area*.

7 Control of Certification and Notification Deadlines

- 7.1 The *Compliance area* has internal mechanisms for alerting the expiration of certification, with the objective of monitoring the expiration dates of the certificates, as well as waivers/exemptions, and keeps the control in the Manager's compliance management system up to date .
- 7.2 According to the ANBIMA Code, the update of ANBIMA certifications must follow the following rule for updating:
 - I. CGE for Certified Professional or Exempt Professional Linked to the Manager:
 - (i) If you are exercising the Eligible Activity and the certification is not expired: indefinite term;
 - (ii) If you are not exercising the Eligible Activity: 3 (three) years, counted from the date of approval in the exam, or from the date of completion of the update procedure, or from the granting of exemption from taking the exam, or from the date on which you cease to exercise the activity of Resource Management.
 - II. CGE for Approved Professional or Exempt Professional Not Linked to the Manager:
 - (i) 3 (three) years, counted from the date of approval in the exam or, from the conclusion of the update procedure, or from the granting of exemption from taking the exam, or from the date that the institution communicates that the professional has ceased to exercise the activity of Resource Management, or, even, from the date that the institution communicates the absence of a link in the Database.
- 7.3 Professionals who have certification whose expiration dates will occur within six (6) months of the database consultation will be informed by the *Compliance area* to arrange for renewal within an appropriate period without compromising the activities developed.
- 7.4 Additionally, the director responsible for the eligible area will also receive a communication about the professionals who have their certificates close to expiration for follow-up and arrangements with the professional.
- 7.5 The eligible professional who does not regularize the renewal of his certification or exemption/exemption by the expiration date will be informed by the responsible director that he will be removed from the respective Eligible Activity, and will only work in support activities. In this case, the Employee will receive an email from the *Compliance area* about the leave and will have their passwords to access the trading systems and brokerage firms blocked, until they are properly updated. The leave will also be controlled in the Manager's control system.
- 7.6 In the event mentioned above, such Employee will only resume his/her activities after the due regularization of the certification and submission of proof to the *Compliance area* for updating with the ANBIMA Database. After the due update, the *Compliance area* will communicate to

the director responsible for the eligible area that the professional on leave is duly regularized with ANBIMA, and may return to the Eligible Activity. à

- 7.7 For all certified professionals who work in an eligible or non-eligible area, they are requested to regularize said certification, as soon as ANBIMA is available to perform the certification tests.
- 7.8 For professionals who may be on leave, the *Compliance area* will send a notification to the Employee's personal email informing the professional that, until the pending matter is settled, they will not be able to perform the Eligible Activities upon returning.
- 7.9 The *Compliance area* will monitor, together with the person in charge of the eligible area, the regularization of the professional and quarterly will monitor the deadlines related to certifications through the Compliance management system, *Compliasset*.

8 Update of the ANBIMA Database

- 8.1 The *Compliance area* must include in ANBIMA's Database the registration information related to its certified Employees, in the certification process, with expired certification, and/or in the process of updating the certification. The information below must necessarily be included in ANBIMA's Database and/or other additional information according to applicable regulations:
 - Date of admission;
 - Date of dismissal, when applicable;
 - Activity performed;
 - Area of expertise;
 - Position;
 - Type of manager, when applicable; e
 - Individual e-mail address.
- 8.2 In addition, it is the responsibility of *the Compliance area* to keep the ANBIMA Database up to date, and must comply with the terms and deadlines stipulated by the regulation, promoting the update of the information in the respective Database until the last day of the subsequent month, considering the date of the event and/or in accordance with the deadline established in the regulation.
- 8.3 The update occurs on the following occasions and/or others that are provided for in the applicable regulations:
 - (i) at the time of admission/dismissal of the professional;
 - (ii) when the professional is certified, even if in an area that is not eligible after hiring (including when the certification has expired and/or is in the process of updating the certification); e
 - (iii) at the time the certified professional is removed or returns from leave.

9 General Provisions

- 9.1 Any doubts about the guidelines of this Policy may be clarified directly with the *Compliance area*.

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