



ORDER ALLOCATION POLICY

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São Paulo, March 3, 2026

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ORDER ALLOCATION POLICY

1 Purpose

- 1.1 To establish the guiding concepts ("Guidelines") used by the Manager in the process of allocating orders/investments among Funds managed by the Manager. Such *Guidelines* shall be applied in the investment allocation decision-making of all FIPs under its management, in compliance with applicable regulation and following market best practices for Venture Capital assets.
- 1.2 This Policy shall guide the *rationale* of the FIP managers, assisting in the performance of their fiduciary duties, whenever it does not conflict with the Funds' Bylaws, and in accordance with the regulation in force in Brazil, so as to make clear the allocation of orders among the FIPs.

2 Scope

- 2.1 This policy must be observed by all Employees and partners of DOMO, respecting market best practices and applicable regulation, understanding that it is intended as a guide, and that the Bylaws, the quotaholder, through the governance in force, as well as the Administrators and Auditors of the FIPs play key roles in the definitions on the subject, with independence to make decisions that may or may not align with the manager's opinion, provided that they comply with the applicable rules and regulations.

3 Portfolio Characteristics

- 3.1 Illiquid Asset. The Venture Capital Asset is illiquid, that is, there is no market trading with relevant volume, which makes its price at any given moment a function of supply and demand at that time, regardless of its intrinsic value. It is an asset class for professional investors seeking high returns on a small portion of their portfolio. Nevertheless, DOMO understands that good Venture Capital asset management takes on relevant risks in pursuit of returns consistent with the level of risk assumed, over the long term. This is how Asset management works at DOMO: the pursuit of high returns and, to that end, the assumption of several risks in the startups in which we invest.
- 3.2 Illiquid Secondary Market. The FIPs managed by DOMO do not offer the repurchase of quotas, and there is no trading or liquid market for the FIPs' quotas. And all quotaholders understand the great uncertainty existing in this asset class until the FIPs' divestment phase. As a consequence, it is understood that a trade of quotas before the termination of the FIP involves relevant risks for buyer and seller. The Manager and/or the Administrator shall use their best efforts to maintain the quota value accurately, respecting the principles of

conservatism and *Fair Value*, in accordance with applicable regulation. However, since the FIP instrument was designed for the long-term investor, the Manager or Administrator cannot ensure, or be held liable for, any loss, cost or opportunity cost that may arise in a private trade of the FIPs' quotas before the termination and redemption of the quotas, pursuant to their respective bylaws.

- 3.3 Investments by Mutual Agreement with the Counterparty (Startups). All investments made by the FIPs depend on the consent of the controlling shareholders of the invested Startups. That is, the decision-making of the Fund or of the Manager is limited by the interest of the Startups' Controlling Shareholders in receiving investments from a Fund, which involves their judgments as to the quality of the Managers, the rules of the FIPs and their Bylaws, the quotaholders of the respective FIP(s), among others.

4 Order Allocation Policy

- 4.1 In order to ensure the priority of investments in the theses agreed with quotaholders and reflected in their Bylaws, all FIPs in an Investment Period managed by DOMO must comply with the following Guidelines:
- 4.2 Formal Investment Commitment in the Bylaws. If there is any clause containing a formal Commitment to invest in a given thesis (sectoral, regional, or by Startup stage), in the analysis and execution of investments, formalized in the Bylaws, it must be literally complied with; that is, if an opportunity is sourced by DOMO, it must be offered to the FIPs in accordance with the priorities assumed in their respective Bylaws;
- 4.3 Conflict among FIPs. DOMO shall not assume conflicting formal commitments in its FIPs;
- 4.4 Co-investment among FIPs. Where there is the possibility and the common interest of both the Counterparty (startup) and DOMO in making any investment through more than one of its respective FIPs, the co-investment shall follow the premises below:
- (i) The FIP with priority assumed in the Bylaws (the "Lead Fund") shall lead the negotiation with the counterparty (Startup), defining the terms and conditions of the investment, it being understood that the Lead Fund shall have the opportunity to allocate at least 50% (fifty percent) of the amount made available, should it so wish;
 - (ii) The FIPs that: (i) are in an Investment Period; and (ii) have discretionary capital available (*drypowder*); and (iii) are accepted by the counterparty (startup), may co-invest with the Lead Fund, by allocating the amount negotiated and accepted by the counterparty.
- 4.5 DOMO may assume investment allocation commitments greater than 50% (fifty percent) in its Funds, and such commitments must be set out in the Bylaws.
- 4.6 DOMO shall maintain, as an annex to this Policy, the list of Funds under its management in an Investment Period, and any formal clause/commitment of such fund to invest in any Sectoral or Regional thesis.

5 Defined Terms

- 5.1 The terms defined in the respective clauses and items of this policy, highlighted in capital letters and underlined, shall have the definitions given in the respective clauses.
- 5.2 Administrator – Understood as the capital Administrator of the respective FIP managed by DOMO; currently this administrator is BRL TRUST;
- 5.3 Assets – Portfolio companies of the FIPs managed by the Manager;
- 5.4 CVM – Comissão de Valores Mobiliários (the Brazilian Securities and Exchange Commission);
- 5.5 DOMO - DOMO VENTURE CAPITAL, GESTORA DE ATIVOS FINANCEIROS E VALORES MOBILIÁRIOS LTDA., a limited liability business company headquartered in the City of São Paulo, State of São Paulo, at Rua Pais de Araujo, nº 29, suites 124, 125 and 126, Itaim Bibi, Zip Code 04531-940, enrolled with the CNPJ under nº 07.424.182/0001-77;
- 5.6 FIPs – The Fundo de Investimento em Participações (Private Equity Investment Fund) is a pool of resources intended for investment in publicly held or privately held companies, or limited liability companies, in a development stage;
- 5.7 Manager – Is the definition of DOMO;
- 5.8 Appraisal Report – Report on the revaluation of Assets at *Fair Value*, to be presented by the manager or by duly qualified third parties;
- 5.9 Venture Capital – Definition of risk capital investment; it is a form of investment focused on small to mid-sized companies that have high growth potential but are still very young and have low revenue, under long-term investment theses.

6 General Provisions

- 6.1 For any other case that may fall outside this Policy, the prior and express approval of the Executive Board shall be required.

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