



PERSONAL INVESTMENT POLICY

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São Paulo, March 5, 2026

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PERSONAL INVESTMENT POLICY

1 Objective

- 1.1 The purpose of this Policy is to establish procedures and rules for Employees' investments, in order to avoid situations that may characterize a conflict of interest or the misuse of confidential information of the Manager and its Investors.

2 General Guidelines

- 2.1 Employees must put the interests of the Manager's Investors first, refraining from carrying out transactions, activities or maintaining relationships that may interfere or appear to interfere with their decision-making.
- 2.2 The Compliance area is responsible for monitoring the personal investments reported by Employees and, in cases where it understands that there is a well-founded suspicion of conduct in dissonance with the provisions of this Policy, submitting them to the appreciation of the Compliance Officer, who may submit them to the Compliance and Risk Committee, so that the appropriate measures can be taken.
- 2.3 Personal investments in securities must observe a minimum period of 10 (ten) days, and speculative transactions are prohibited, such as "Day Trade" and other transactions with a term shorter than that provided above.

3 Scope

- 3.1 This Policy covers DOMO Employees. For the purposes of this Policy, specifically, they will be referred to as "Contributors" only.
- 3.2 In some circumstances, certain Direct Family Members may be characterized as Related Persons, provided that there is an express demand from the Compliance, Risk and AML/CFT Committee, based on relevant motivation in the opinion of said committee.
- 3.3 All Employees must sign the Term of Adhesion to the Personal Investment Policy, contained in Annex I of this Policy, committing themselves to know the entire content of this Policy and fully comply with it, as well as enforce their respective Immediate Family Members and Related Persons, if required by the Compliance Department, declaring their full name(s) and CPF of these.

4 Prohibitions**4.1 Derivatives with Unlimited Potential Loss; Day-trade**

- 4.1.1 Due to the potential risk implicit, and the speculative bias that such assets may take, DOMO, its Employees, and Related Persons may not carry out operations, on its own behalf or on behalf of third parties, that involve derivatives that may generate unlimited losses, or enter into "Day Trade" operations.
- 4.1.2 This prohibition covers any kind of trading on the stock exchange or organized over-the-counter market, including buying and selling, loans and donations.

4.2 Other Limitations

4.2.1 It is strictly forbidden for Employees:

- a. To trade securities of companies in which DOMO has capital exposure, or is in the process of being approved to initiate capital exposure; and
- b. To trade securities of companies that are being subject to analysis/prospection by DOMO.

4.2.2 The Compliance area will maintain a restricted list of issuers whose securities may not be traded by Employees, due to potential conflict or access to material information not yet disclosed.

5 Investments exempt from communication and approval of the Compliance area

5.1 The operations indicated below do not depend on prior communication or approval from the Compliance area, subject to the other provisions of this Policy:

- a. Shares of Brazilian or foreign publicly held companies that:
 - (i) Are not under analysis, prospecting or diligence by DOMO;
 - (ii) Have no relationship with companies invested by the Manager's Funds;
 - (iii) Are not subject to restrictions communicated by the Compliance area.
- b. Savings investments;
- c. Foreign exchange operations;
- d. Government bonds issued by the Brazilian government or other jurisdictions;
- e. Securities issued by a Brazilian financial institution or other jurisdiction not traded on the stock exchange, such as CDBs, RDBs, Repo Operations, Real Estate Letters of Credit and Agribusiness Letters of Credit;
- f. Investments in shares of third-party open-ended investment funds, provided that there is no relevant exposure to assets or companies invested by the Funds managed by DOMO;
- g. Other operations may be exceptionally waived by decision of the Compliance area, upon registered justification.
- h. The operations below also do not require approval:
 - (i) Private pension plans (PGBL/VGBL);
 - (ii) Treasury Direct;
 - (iii) DI funds and fixed income funds with daily liquidity;
 - (iv) ETFs of broad indices (ex: Ibovespa, S&P 500);
 - (v) Third-party multimarket funds (without a focus on venture capital).

6 Investments that require pre-approval from the Compliance area

6.1 Any and all investments not mentioned as exempt in the item above require pre-approval from the Compliance area.

7 Communication, approval and validity of operations

7.1 Operations that depend on approval by the Compliance area must be submitted and communicated through the email: dir.compliance@domo.vc

7.2 The compliance department undertakes to respond to any request from Employees bound by this Policy within ten (10) business days, and may request additional time if it deems necessary.

- 7.3 Any approval that the compliance department may grant will be valid for 7 (seven) business days.

8 Insider trading, market manipulation or duty of confidentiality

- 8.1 In their personal negotiations, the Employee must ensure that they are not violating any rules on the use of privileged information, market manipulation or duty of confidentiality, and the Insider Trading Prevention Policy and the Unfair Market Practices and Confidentiality of Information Policy must be fully observed, in particular the terms of CVM Resolution No. 44/2021 and Law No. 6,385/1976.

9 Period of Restriction

- 9.1 The Chief Compliance Officer may determine blackout periods ("Blackout Period") during which certain personal trades will be prohibited, especially when DOMO is conducting relevant due diligence, investment or divestment negotiations.

10 Sending Statements

- 10.1 As of the publication of this Policy and at the beginning of their relationship with DOMO, all Employees (including Related Persons), who eventually hold positions in securities brokerage firms must, if requested by the Compliance area, provide a copy of the custody statement of all accounts subject to the investments mentioned in this Policy for the previous fiscal year, at least annually, until May 31 of each year.
- 10.2 Such practice is necessary so that the Compliance area can, if necessary, monitor and follow the progress of allowed investments or divestments, as well as make sure that the proper authorizations for all transactions have been duly requested and granted.
- 10.3 The responsibility for sending the statement, if formally required by Compliance, is exclusive to the Employee. However, the Compliance area may notify you of the submission in case of omission. Failure to send a statement when requested will be reported to the Risk, Compliance and AML/CFT Committee and may result in disciplinary sanctions, under the terms of the Manager's Sanctions Policy.

11 Investments of the Manager - Own Portfolio

- 11.1 DOMO does not carry out operations with Variable Income Assets for its own portfolio, performing cash management in a conservative manner, with liquid fixed income assets and investment funds with liquidity in the short term, maintained in a first-rate national bank.
- 11.2 DOMO and its partners may, however, invest in FIPs managed by the Manager itself, if it is a commitment made to the quotaholders/investors, demonstrating alignment of interests with them, and always with the prior approval of the Executive Committee and the Risk, Compliance and AML/CFT Committee.

12 Penalties within the scope of the Personal Investment Policy

- 12.1 Failure to comply with the guidelines set forth herein will be grounds for disciplinary action under the terms of the Manager's Sanctions Policy, as provided for in the Code of Ethics and Conduct, which may include dismissal and, if applicable, forwarding of the appropriate information to the competent regulatory and self-regulatory bodies.

- 12.2 Even if the relationship with DOMO is terminated, the Employee may be held personally liable for any unlawful or illegal act committed during the period in which he or she has performed his/her activities at the Manager. Such liability may subject Employees to applicable civil, criminal, or regulatory penalties.
- 12.3 DOMO may also request that the Employee reverse or cancel the operation carried out in violation of this Policy and may adopt additional legal procedures as appropriate.

13 General Provisions

- 13.1 This Policy will be reviewed at least annually or whenever there is a relevant regulatory change or whenever deemed necessary by the Compliance area.

ANNEX I

**TERM OF ADHESION
DOMO'S PERSONAL INVESTMENT POLICY**

I, , Subscribed in the CPF/MF under o No
, acting as (position) of DOMO, I hereby certify that:

- I have received a copy of DOMO's Personal Investment Policy;
- I have become aware of the obligations to which I am subject, including with regard to the responsibility for the Related Persons and Immediate Family Members, as defined in the Policy;
- I am aware that the use of the Manager's information and information systems is monitored, and that the records thus obtained may be used to detect violations of the Policy and, as the case may be, serve as evidence in administrative and judicial proceedings;
- I agree with the entire content of the Policy and am responsible for non-compliance with any obligation provided for therein, by action or omission;
- I declared to the Compliance area the full name and CPF of the People Related to me and Immediate Family Members, as defined in the Policy; e
- I declare that I have read and fully accepted the terms and rules of the Policy, expressing full agreement and unrestricted adherence to said terms and rules, about which I declare to have no doubt.

I inform you that *(mark with an X the appropriate option and instruct this statement with all the pertinent documents)*:

☐ I DO NOT HAVE A BROKERAGE ACCOUNT;

☐ I HAVE A BROKERAGE ACCOUNT, ACCORDING TO ATTACHED STATEMENTS, AND I AM AWARE OF MY OBLIGATION TO DISINVEST, WHEN APPLICABLE, UNDER THE TERMS OF THIS POLICY.

Date: Signature: