



APPROVAL OF MARKETING MATERIALS AND COMMUNICATION WITH INVESTORS POLICY

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APPROVAL OF MARKETING MATERIALS AND COMMUNICATION WITH INVESTORS POLICY**1 Purpose**

- 1.1 This Policy is part of DOMO's Compliance and Integrity Program and must be observed together with the Code of Ethics and Conduct, the Compliance Policy, the Risk Management Policy, the Insider Trading Prevention Policy, the Personal Investment Policy and other internal rules, forming the system for preventing, detecting and remediating legal, regulatory and reputational risks related to investor communications.
- 1.2 This Policy aims to formalize the procedures inherent in the preparation and disclosure of communications with Investors and marketing materials of the Manager and the Funds, whether such documents are delivered in hard copy during in-person visits, sent via email or direct mail, or used in presentations at roadshows and events.

2 General Guidelines

- 2.1 For purposes of applicable law and this Policy, Advertising means any communication concerning institutional advertising and the marketing strategy of the Funds, between the Manager and Investors or prospective investors, through public media made available in public places, direct mail, email marketing, or any other public media or websites (television, print, radio, digital, audiovisual and technologies that may emerge).
- 2.2 Under the ANBIMA Guidelines, Advertising may be divided into **(i)** Advertising Material: material used for commercial purposes and resulting from a marketing strategy aimed at marketing the Funds; and **(ii)** Institutional Advertising: material used by the Manager for communication strategy purposes when related to the performance of its management activities.
- 2.3 Technical material, in turn, means any material requested from the Manager by an Investor or prospective Investor, addressed to such specific recipients, in order to support an investment decision.
- 2.4 Any communication with Investors and marketing of the Manager or the Funds that falls within the definition of advertising material, institutional advertising or technical material ("Advertising or Technical Material") must comply with the guidelines set forth in this Policy, in addition to other guidelines established by ANBIMA and the CVM.
- 2.5 The preparation and disclosure of materials shall follow a risk-based approach, taking into account, among other factors, the profile of the target audience, the jurisdiction, the type of product, the stage of the fund, performance content, the use of public media and the degree of sensitivity of the information disclosed, and the Compliance Department may require additional controls depending on the criticality of the material.

3 Examples of Advertising and Technical Materials

- 3.1 Any non-exclusive material sent through direct mail, such as monthly information reports on the Funds;
- 3.2 Any material sent, on an exclusive basis, directly to an Investor's email address that is not expressly mentioned in Section 4 above;
- 3.3 Institutional or product pitches and presentations used for direct contact, for commercial purposes and as part of a business strategy;
- 3.4 General newsletters and announcements;
- 3.5 Presentations, product descriptions, market commentaries and all types of written material used to promote or support the distribution of products to Investors or potential Investors;
- 3.6 Any kind of advertising campaign broadcast in national or foreign media; and
- 3.7 The Company's website.

4 Not considered to be Advertising or Technical Materials

- 4.1 Registration forms, Investor or investment profile questionnaires, materials intended to notify investors of changes in addresses, telephone numbers, personnel or other simple reference information for investors;
- 4.2 Ongoing disclosure of unit value, net asset value and profitability by any means, as well as portfolio disclosure in accordance with the disclosure policy set forth in the respective Bylaws, Supplementary Information Form, portfolio management monitoring letters and Essential Information Sheet;
- 4.3 Materials related to market research, gauging interest in products and/or product classes not yet in existence, questionnaires and efforts to understand investor profiles;
- 4.4 Balances, statements and other materials intended to report share or financial positions, transactions and profitability, provided they are restricted to this or similar information; and
- 4.5 Other materials and information in the form requested by the Investor.

5 Approval process for Advertising or Technical Materials

- 5.1 All marketing and investor communication materials prepared by the responsible department must comply with the following procedure:
- 5.2 They should be sent by email to the Compliance Department for review. In the case of materials for Brazilian Investors and prospects, the document must be sent sufficiently in advance so that the department can assess the entire content, make comments, send it to an external advisor if necessary, review changes and approve the final draft;

- 5.3 In the case of materials destined for other jurisdictions, at the outset of the project, the Compliance Department should be involved in conducting a survey of the legal and regulatory requirements applicable in the target jurisdiction. The process of analyzing foreign jurisdictions may require consulting foreign experts, therefore it is not possible to set a minimum period;
- 5.4 After receiving approval from the Compliance Department, the responsible department must keep the entire history of information, as well as all versions and changes to the document;
- 5.5 Standard materials, such as monthly and periodic reports and other previously approved documents, once analyzed by the Compliance Department, do not need to be approved each time they are used (i.e. provided that there is no new content, but only changes to fee numbers, P/E, AUM, etc.).
- 5.6 Standard materials shall be reviewed annually by the Compliance Department or whenever there are changes in content. The Compliance Department may subsequently monitor the materials disclosed, including versions published in digital media, in order to verify compliance with the approvals granted, applicable regulations and internal guidelines, and may order adjustments, removal of content or adoption of corrective measures.

6 Request for approval of Advertising or Technical Materials

- 6.1 Requests for approval of Materials that have not been previously approved and/or that may conflict with this Policy shall be sent to the Compliance Department by email at dir.compliance@domo.vc and shall contain the following:
- 6.2 Name of the document, type of material and purpose;
- 6.3 Name of the Employee responsible for preparation and review, if applicable;
- 6.4 Target audience;
- 6.5 Media used;
- 6.6 Maximum period for completion;
- 6.7 Jurisdiction where the material will be distributed; and
- 6.8 Attachment with the material to be evaluated.

7 Responsibilities

- 7.1 The department that prepared the material is responsible for: **(i)** all of its technical content, **(ii)** visual identity, **(iii)** the type of media to be used, **(iv)** identifying the target audience of the presentation; **(v)** including the source and date in all images, charts, tables and references used; and **(vi)** submitting the material for review by the Compliance Department. Sources of public or third-party information must be included in the material whenever applicable.
- 7.2 The department responsible for preparing the material (and the Employees involved) shall be accountable for it to regulatory and self-regulatory bodies, as well as to the market and competitors. Therefore, they must never use unfounded or untrue information, information copied from third parties, or information inconsistent with the Funds' bylaws, sheets and other documents.

8 Guidelines for making and distributing Advertising or Technical Materials

- 8.1 They must not use unsubstantiated hyperbole and superlatives and must have clear content, always seeking the interpretation made by the “average person”;
- 8.2 They must be prepared using sober and moderate language, warning readers of investment risks;
- 8.3 All documents must have their target audience specified;
- 8.4 They must not contain unjustified conclusions, opinions without a reasonable basis or predictions of future events without a technical basis;
- 8.5 Those containing charts must have a title, a description of the data shown on the axes and a date;
- 8.6 Those containing external references must include the source and date;
- 8.7 Those containing Rating Notes on companies, countries and assets must include the date and name of the Rating agency;
- 8.8 They must contain information that is consistent with the Regulations, the Key Information Sheet and other Fund documents;
- 8.9 They must mention the existence of the Key Information Sheet, if applicable, and the Regulations, as well as the website addresses from which these documents can be obtained;
- 8.10 Be presented together with the Key Information Sheet, if applicable;
- 8.11 They must not guarantee, promise or suggest the existence of guaranteed results or the absence of risk;
- 8.12 They must follow all regulatory and self-regulatory notices, especially those arising from CVM Instructions and ANBIMA’s Guidelines for Advertising and Distribution of Technical Material for Funds;
- 8.13 Any disclosure of information about the Funds’ results may only be made, through any medium, after a grace period of 6 (six) months from the date of the first issue of shares;
- 8.14 All information disclosed through any medium, in which reference is made to the Fund’s profitability, must comply with CVM and ANBIMA regulations;
- 8.15 All materials produced must be kept for a period of at least 5 (five) years.

- 8.16 The preparation and distribution of materials shall comply with Law No. 13,709/2018 (LGPD), particularly with regard to the processing of personal data of investors, prospects and third parties, ensuring purpose, necessity, information security and confidentiality.
- 8.17 The engagement of third parties to prepare, review, translate, distribute or disclose marketing materials (including advisers, consultants, placement agents and commercial partners) must be approved in advance by the Compliance Department.

9 Restriction on General Advertising and General Solicitation

- 9.1 The SEC also has strict rules on advertising and marketing, especially regarding anti-fraud rules, accuracy of information, target-audience qualification and performance disclosure. Therefore, the Manager and the Distributors must pay special attention in the event of any fundraising from U.S. investors.
- 9.2 In the case of offshore funds qualified as private funds, marketing material may not be distributed indiscriminately and must be offered to Investors or prospective Investors who have a pre-existing (at least 30-day) and substantive relationship with DOMO (i.e., where the Manager knows the prospect's financial condition and sophistication).
- 9.3 Employees who interact with Investors must be confident and obtain sufficient information to demonstrate and substantiate the existence of such pre-existing and substantive relationship, or request specific approval from the head of the Compliance Department.
- 9.4 The SEC does not permit the public and indiscriminate disclosure of any information about private funds (e.g., open websites or conferences for the general public).

10 Digital Communication

- 10.1 The use of digital media and social networks (such as websites, LinkedIn, Instagram, webinars, podcasts, institutional videos and other public platforms) to communicate with investors or prospective investors constitutes Advertising and shall be subject to the same prior approval, monitoring, recording and retention rules set forth in this Policy.

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