



PREVENTION OF INSIDER TRADING AND UNFAIR TRADE PRACTICES POLICY

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São Paulo, March 5, 2026

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PREVENTION OF INSIDER TRADING AND UNFAIR TRADE PRACTICES POLICY
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1 Purpose

- 1.1 This Policy is part of DOMO's Compliance and Integrity Program and must be observed in conjunction with the Code of Ethics and Conduct, the Compliance Policy, the Personal Investments Policy, the Risk Management Policy and other internal rules.
- 1.2 The purpose of this Policy is to establish rules and procedures aimed at preventing the use of Inside Information when trading securities in the Funds' portfolios, possibly held by Associates.

2 Scope

- 2.1 This Policy must be observed by all DOMO Associates who, along with any Third Parties who may be defined by the Risk, Compliance and AML/CTF Committee, need to specifically adhere to this Policy.
- 2.2 In some cases, certain Direct Relatives may be included in the scope of this Policy, provided there is a relevant motivation for doing so.

3 Concept of Insider Trading

- 3.1 The practice of insider trading involves carrying out transactions with the use of material information not yet disclosed to the market, with the intention of obtaining a financial advantage for oneself or third parties, as defined by the regulations in force.
- 3.2 The misuse of Inside Information, both in the Funds' transactions and in the Associate's personal transactions, constitutes a crime, as well as a civil and regulatory offense. This practice affects the credibility, stability and efficiency of the capital market, and must therefore be avoided by all those who operate in this market.

4 Risk Analysis

- 4.1 As part of the research process, DOMO engages or may engage with certain investment consultants, which may or may not be industry/sector specialists, also known as "expert networking firms". The hiring of such service providers must comply with the guidelines established in the specific procedure for hiring these specialists, in accordance with this Policy and DOMO's Code of Ethics and Conduct.
- 4.2 In addition, the constant interaction of Associates with members of the capital markets, especially employees or representatives of public or private companies, must also comply with the specific provisions for preventing the use of Inside Information, as set out in this Policy.
- 4.3 Considering that DOMO Associates are allowed to participate in Administrative or Fiscal Boards, Committees or other management bodies, or have technical and

advisory roles in other companies, there is also the risk of DOMO being exposed to Inside Information resulting from such relationships.

- 4.4 The prevention of the use of Inside Information will follow a risk-based approach, taking into account the profile of the strategies, the degree of Associates' access to sensitive information, the frequency of interaction with insiders and the nature of the assets traded, and the Compliance Department may strengthen controls, monitoring and restrictions according to the level of criticality identified.

5 Brazilian standards and CVM precedents

- 5.1 The practice of insider trading constitutes an illegal act in the administrative field and is also classified as a crime in the legal system. In 2001, Law 6,385/76 was amended to include article 27-D, which defines this practice:

“The use of material information not yet disclosed to the market, to which one has access and must keep confidential, that could provide, for oneself or others, an unfair advantage through the trading of securities on one’s own behalf or that of third parties:

Penalty - imprisonment, from 1 (one) to 5 (five) years, and a fine of up to 3 (three) times the amount of the illegal advantage obtained as a result of the crime.”

- 5.2 Brazilian regulations impose several conditions restricting the trading of securities which, if not complied with, may constitute insider trading. These conditions are defined in Law 6,404/1976, Law 6,385/1976, as well as CVM Instructions No. 44/2021 (Material Information), CVM No. 160/2022 (Public Offerings), 388/2003 (Investment Analysts) and CVM No. 21/2021 (Management of Securities Portfolios), as applicable.
- 5.3 Misuse of Inside Information can occur regardless of whether a profit is being made, as the CVM has stated in several current precedents. According to the CVM's current view, insider trading can be determined on the grounds of strong suspicion, without the necessity of obtaining evidence for launching an administrative or police investigation (known as indicative evidence within the CVM). In addition, the burden of proof is reversed, which means that there is a reasonable assumption of the crime being committed, and the burden is on the accused to prove that there was no causal link between the profits made and the outcome of the market, nor that the Inside Information was used to make a profit or prevent a loss.
- 5.4 In order to prove that Inside Information has not been used or to reduce the possibility of its use, the following techniques set out in this Policy and Manual are adopted:

(a) imposing restrictions on trading during certain periods; (b) controlling and restricting access to information; and (c) recording interactions with potential insiders; and (d) prior definition of the future form of trading, in certain cases.

6 What is Material Information?

- 6.1 Information should be considered material if it can significantly influence the decision-making process of an investment or affect the price of a security.

6.2 The following are examples of instances, among others, where Associates should be aware of the existence of Inside Information (whether received verbally or in writing):

- Information on the company's operating results;
- Corporate changes (mergers, demergers and takeovers);
- Changes in senior management bodies;
- Information on the buying and selling of companies, bonds or securities, including initial public offerings (IPOs) or follow-on public offerings (FPOs);
- Relevant new discoveries, patents, projects or contracts that are the subject of a signed confidentiality agreement; and
- Situations of insolvency, bankruptcy or judicial reorganization.

6.3 Inside Information may affect one or more classes of shares of one or more companies, and all types of securities, including, but not limited to, shares, options, futures, forwards, swaps and debentures.

7 What is Nonpublic Information?

7.1 Information is considered non-public if it has not yet been officially disclosed by the public media. Information classified as non-public does not change its status to public information solely through selective dissemination, even if it is revealed to a large number of people, for instance, during a presentation, over lunch with executives or through emails, text messages, messages on Bloomberg, telephone conversations, etc.

7.2 Formal presentations made by companies can only be considered public when their content is available on the Internet.

7.3 Furthermore, non-public information can sometimes be unintentionally passed on or shared through informal conversations, in situations relating to the Associate's private life. In these cases, even if they have received the information unintentionally, the Associate must follow the same procedures defined in Section 9 of this Policy.

8 Sources of Inside Information and relationships with potential insiders

Examples of Sources of Inside Information	
● Board members, officers or committees of public companies ● Corporate access as IR (Investor Relations) for public companies ● Value-added investors who may potentially possess Inside Information about investee companies due to their position in the company ● Research analysts, employees of investment banks and brokerage firms ● Political intelligence companies	● Investment consultants ● Industry and sector experts ● Public relations professionals ● Creditors' committees ● Lawyers and auditors ● Other asset managers ● Personal and professional relationships ● Participation of spouse or direct relative in any of these activities

- 8.1 Associates must act diligently when interacting and exchanging information with individuals and companies that are potential holders of Inside Information, never encouraging them to disclose material non-public information, especially in exchange for compensation.
- 8.2 Associates should be extremely cautious about using investment recommendations from any of these people, whether they are Investors, third-party contractors or personal contacts.
- 8.3 If the Associate notices any sign that the information and/or investment recommendations coming from potential holders of Inside Information are based on material non-public information, the Associate must inform the Compliance Department so that it can be investigated, in accordance with the procedures defined below.

9 Internal Procedures - Duty to Inform Compliance

- 9.1 Any Associate who somehow gains access to Inside Information, whether temporarily or occasionally, must immediately inform the Compliance Department, so that it can adopt the appropriate measures described in this Policy, and must refrain from using it in the course of their activities, for their own benefit or that of the Funds, or from disclosing it to third parties.
- 9.2 The Compliance Department must always be informed in the following situations:
 - whenever new, potentially material confidential information comes to the attention of the Associate;
 - the conclusion of a contract that establishes an exchange of potentially material confidential information about a particular issuer of securities; and
 - the existence of a commercial, professional or trust relationship between DOMO and a public company, resulting in the exchange of potentially material information.
- 9.3 If the Associate has any doubts regarding the existence or absence of Inside Information, they should consult the Compliance Department before carrying out any transaction with the security in question or disclosing the information to third parties.
- 9.4 In addition, Associates must not discuss any potential Inside Information with co-workers, including other Associates, except as specifically required by their position and for the performance of their duties.
- 9.5 In addition, the Compliance Department may carry out periodic monitoring, including through electronic systems and of the Associates' personal transactions, in order to identify atypical patterns, temporal correlation with material events, non-compliance with Blackout Periods and other indications of misuse of Inside Information.

10 Total and Partial Restrictions

- 10.1 Once the materiality or expected future materiality of the information and its confidential nature has been confirmed, the Compliance Department will classify the related security as totally or partially restricted.

- 10.2 The classification of a security as restricted will result in limitations on the trading of all securities from the issuer in question, traded in Brazil or abroad, as well as securities related to it.
- 10.3 For the purposes of this Policy, trading includes not only transactions involving the purchase and sale of securities, but also transactions involving loan agreements (securities or BTC lending), either in the position of lender or borrower, in accordance with CVM/SEP Circular Letter No. 01/2014.

11 Creating a Watchlist

- 11.1 This list should be created if the information of a material nature is not yet material or does not contain the elements needed for its confirmation at the time, but will require monitoring by the Compliance Department.
- 11.2 In this case, the Risk, Compliance and AML/CTF Committee may determine the partial restriction of the asset, i.e. authorizing the trading of securities issued by the respective company only in the same direction that the Asset Managers have been positioned in the last 30 (thirty), 60 (sixty) or 90 (ninety) days (neutral, long or short), stating these parameters in its written resolution.
- 11.3 In addition, the Compliance Department may determine that, due to ongoing relationships with any potential insiders, certain securities issued by public companies that have ongoing relationships with these people should be monitored periodically and more closely.

12 Creating a Restricted List

- 12.1 This list should be created if, at the time of reporting or awareness by the Associate, the nonpublic information is material and factual. The Associate's details and those of the security and company involved must be kept on the restricted list until the publication of the Inside Information.
- 12.2 As a result of a particular company being included on the restricted list, all Associates must refrain from carrying out transactions with securities issued by said company. In other words, none of the Associates, Funds, Managed Portfolios or companies linked to DOMO may trade in the securities of the company in question.

13 Procedure for hiring and using investment consultants and expert networking firms

- 13.1 As mentioned in this Policy, DOMO's Associates, especially those in the business department, have or may have relationships with certain investment advisors, also known as "expert networking firms". The hiring of such service providers must comply with the following guidelines:
- Associates must be familiar with the compliance policies of the investment advisors with whom they intend to maintain a relationship;
 - Associates must inform the Chief Compliance Officer (CCO) about any interaction with investment advisors, with the prior approval of the Risk, Compliance and AML/CTF Committee being required to initiate a relationship with such service providers;
 - Investment advisors should not be hired to provide services that involve

providing information linked to their current employer. In addition, Associates must ask investment advisors in writing whether they are authorized by their current employers to provide services of this nature; and

- Associates must proactively inform investment advisors that they do not wish to receive Inside Information.

13.2 In cases where an Associate suspects that they have received Inside Information resulting from these interactions, they must immediately inform the CCO (stating the source of access, as well as the nature of the information obtained), who may decide to include the security on the restricted or monitoring list, as described in this Policy.

14 Records of meetings and interactions with insiders and potential insiders

14.1 Associates who intend to meet with the investment advisors referred to in the section above, or with analysts or management members of public companies, PEPs, or other individuals who may potentially hold Inside Information, must comply with the following procedures:

- At least two representatives of the Companies must be present;
- After the meeting, a record must be kept of the meeting and the matters discussed. If in doubt about the content and the method of recording, the Associate should contact the Compliance Department; and
- Entries in personal calendars (e.g. Outlook) must always be backed up in order to protect information about the meeting.

14.2 The Compliance Department will be able to monitor these records periodically. It is recommended that separate records be kept for information from each of these sources.

14.3 In addition, the Compliance Department may, whenever it deems necessary, attend meetings with insiders and potential insiders in order to understand the information discussed, review samples of emails involving Associates and such individuals, and monitor the frequency with which investment advisors are being used.

15 Information Barriers - Chinese Wall

15.1 In the event that any DOMO Associate or department possesses Privileged Information and the Compliance Department deems it appropriate to implement segregation between said Associate or department to prevent communication between certain DOMO Associates or departments, the Compliance Department may implement physical and digital information barriers to preserve the confidentiality of certain Inside Information and prevent its communication between DOMO departments.

15.2 Associates must not share restricted information subject to information barriers with other departments without the prior approval of the Compliance Department. At times, it may be necessary for the CCO to be present at meetings or CC'd in emails in order to ensure that any exchange of information has taken place appropriately.

15.3 These situations must be documented by the Compliance Department in conjunction with the maintenance of the restricted list.

- 15.4 If any Associate or the Asset Managers themselves become associated with a particular company, formally adhering to the securities trading policy issued by the company itself, or if Investors who are the final beneficiaries of Managed Portfolios or exclusive Funds managed by DOMO become associated with said company, the Compliance Department must restrict the Asset Managers or Funds in question during the company's "Blackout Period", in accordance with the published corporate calendar or information issued by the Investor Relations Officer (IRO) of the respective company.

16 Need for Sharing Inside Information

- 16.1 In cases where there is a proven need for sharing Inside Information, such as when consulting lawyers, accountants and outside experts, such relationships must be formalized and require, as an essential prerequisite, a confidentiality agreement or clause.
- 16.2 Before sharing any Inside Information with third parties, in full or in part, Associates must ensure that the third party has signed the aforementioned agreement with the Asset Managers and is aware of the contents of this Manual, as well as the Sanctions Chapter of the Code of Ethics and Conduct.

17 Unfair Trade Practices and the Creation of Artificial Supply and Demand Conditions

- 17.1 None of DOMO's Associates may engage in activities with the deliberate purpose of causing the price of a particular security to rise or fall.
- 17.2 Significant changes in the price of securities can be the result of normal market fluctuations. However, certain actions and/or omissions by market participants relating to the purchase and sale of securities may be considered intentionally manipulative and, consequently, may constitute market manipulation or unfair practices under Brazilian law (Law 6,385/76, art. 27-C and 27-F).
- 17.3 The following also constitute unfair practices and can therefore be considered manipulation of market prices:
- (i) The spreading of rumors or gossip, in other words, information whose origin cannot be verified or certified and whose participants do not have the formal capacity and legitimacy to speak on behalf of the company, in such a way as to affect the price of a particular security; and
 - (ii) So-called "front running", which involves the misuse of information about Investor activities in order to perform transactions in anticipation of activities that are known to or could potentially influence the price formation of a particular security.
- 17.4 If DOMO finds that any Associate has been involved in market manipulation or other fraudulent activities, in addition to the measures relating to internal sanctions provided for in this Policy, the CCO shall report such irregularity or suspected irregularity to the CVM, with the Associate in question also being subject to the applicable civil, criminal and regulatory sanctions.
- 17.5 The report must be submitted to the CVM within 10 (ten) days of it becoming known, under the terms of the Compliance, Internal Controls and Adherence to

CVM Instruction No. 558/15 Policy.

- 17.6 In the event of any manipulation or fraud being found on behalf of an Associate, any losses arising from such actions or omissions will not be borne by the Funds and must be absorbed by DOMO or the Associate involved, where applicable, at the discretion of the Risk, Compliance and AML/CTF Committee.

18 Incidents and Disciplinary Measures

- 18.1 The identification of material indications of misuse of Inside Information or market manipulation must be immediately reported to the Chief Compliance Officer (CCO) and to the Risk, Compliance and AML/CTF Committee, which must then define an action plan to resolve the situation.
- 18.2 Failure to comply with this Policy will subject the offender to the applicable disciplinary measures, taking into account the seriousness of the conduct, including warning, suspension, dismissal and other sanctions provided for in the Code of Ethics and Conduct, without prejudice to notifications to the competent authorities and to civil, administrative or criminal liability.