

ABSOLUTO PARTNERS GESTÃO DE RECURSOS LTDA.

ESG POLICY

January 2024

www.absolutopartners.com.br

INTRODUCTION

The purpose of this Policy ("Policy") is to establish the principles, concepts and values that guide part of Absoluto Partners' investment process in the analysis of risks and opportunities related to *Environmental, Social and Governance* ("ESG") issues.

We believe that monitoring and evaluating environmental, social and governance risks is of great importance in long-term investments in order to ensure that the business models of the investee companies are resilient in the long term.

1. APPLICATION

This Policy must be followed by all Absoluto Partners' business areas, according to the specifics of each area. All members of Absoluto Partners must comply with the guidelines set out herein and use their best efforts to promote the Policy and its objectives.

2. FUNDAMENTAL PRINCIPLES

The companies that make up the *portfolio* of Absoluto Partners' funds must have a mapping of risks and opportunities focused on *ESG* practices and this mapping must be reviewed every 18 months.

Remember that all analyses must be based on the principles of good faith, transparency, diligence, loyalty and truthfulness.

3. STANDARDS OF CONDUCT AND ENGAGEMENT

In the performance of their duties, analysts must:

- (a) Maintain high ethical standards of conduct;
- (b) Engage periodically with investee companies in order to understand and quantify risks and opportunities;
- (c) Evaluate the achievement of previously set targets;
- (d) Seek to address certain risks related to the *ESG* agenda;
- (e) Engage formally with the investee companies in formal or non-formal settings, voting at ordinary and/or extraordinary meetings, expressly manifesting itself to the bodies of the investee companies, with a view to extending the decisions taken; and
- (f) Evaluating divestments when the investee company refuses to engage and/or makes decisions that we believe are necessary to mitigate risks.

4. MONITORING

In the performance of their duties, analysts must:

- (a) Regular evaluation of the *portfolio* 's investments based on the assumptions drawn up for each sector, with the depth of the evaluation taking into account the investee company's corporate purpose, its relevance in the *portfolio* and the materiality of the issues;
- (b) Make regular interactions with investee companies with the relevance that the topic requires, considering the premises of item "a" above; and
- (c) *ESG* evaluations should include qualitative comments aimed at verifying progress on agendas considered relevant by Absoluto Partners.

5. SUSTAINABLE PRACTICES

Absoluto Partners must always seek to adopt practices and actions aimed at minimizing any environmental impacts in all its activities. Besides, Absoluto Partners encourages its employees to adopt a similar attitude in their daily activities, not only in environmental practices but also in social practices.

Absoluto Partners is a company engaged in social practices through direct actions or through federal and municipal tax incentive laws: Federal Culture Incentive Law (Law 8.313 of December 23, 1991); the Sports Incentive Law (Law 11.438 of December 29, 2006), and the Municipal Culture Incentive Law (Law 5.553 of January 14, 2013).

Notwithstanding the practices adopted and mentioned in this Policy, Absoluto Partners has no funds or investment classes identified as SI (Sustainable Investing) or that integrate ESG aspects, under the terms of Anbima's Rules and Procedures for the Administration and Management of Third Party Resources. In addition, Absoluto Partners refrains from using suffixes or any other terms in its materials and in the documents of its funds and investment classes that could mislead the investor.

6. OTHER CONSIDERATIONS

Any questions or requests for clarification relating to this Policy can be addressed to the Risk and *Compliance* Officer.

This Policy was reviewed in January 2024 and approved by the Board of Directors in January 2024, when it came into force. Its use classification is: public document.