



ABSOLUTO PARTNERS GESTÃO DE RECURSOS LTDA.

INTERNAL CONTROLS AND *COMPLIANCE* MANUAL

January 2026

www.absolutopartners.com.br

1. INTRODUCTION

The Absoluto Partners Gestão de Recursos Ltda. ("Absoluto Partners") is a limited liability company dedicated to providing securities portfolio management services, in the "asset manager" category.

In carrying out these activities, Absoluto Partners is subject to the rules governing the Brazilian capital market, especially the rules issued by the Brazilian Securities and Exchange Commission (CVM), which currently regulates portfolio management activities through CVM Resolution No. 21, dated February 25, 2021 ("CVM Resolution No. 21"), as well as the Code of Regulation and Best Practices of the Brazilian Association of Financial and Capital Market Entities ('ANBIMA'), notably the Code of Administration and Management of Third-Party Resources ("Code of Administration and Management of Third-Party Resources").

This Internal Controls and *Compliance* Manual ("Manual") aims to establish the rules, procedures, and internal controls required by CVM Resolution No. 21 and ANBIMA's Code of Administration and Management of Third-Party Resources.

This Manual applies to all partners, administrators and employees of Absoluto Partners ("Employees"), so that, concomitantly with the start of their duties at Absoluto Partners, Employees will be informed of the existence of this Manual and will sign, either physically or electronically, an Adhesion Agreement(**Annex I**). Absoluto Partners will keep an original copy, in electronic or physical format, of the Adhesion Agreement duly signed by each Employee on file at Absoluto Partners' head office for a minimum period of 5 (five) years.

In addition, Absoluto Partners will make a copy of this Manual available at its head office and on its website (www.absolutopartners.com.br) for consultation. If there are any doubts about the interpretation of the rules contained in this Manual, or if advice is needed, the Employee should seek assistance from the Risk and *Compliance* Officer.

Failure to comply with the rules set out in this Manual will be considered a breach of contract and will result in the imposition of penalties, without prejudice to any applicable legal measures.

2. COMPLIANCE STRUCTURE

Absoluto Partners' Internal Controls and *Compliance* Department is the responsibility of the Risk and *Compliance* Officer, whose duties include controlling and supervising the professional practices of all Employees in order to comply with the rules set out in this Manual, in the regulations and in current legislation.

With this in mind, the *Compliance* Department acts with the aim of:

- (i) ensure that the operations and activities carried out by Absoluto Partners comply with the applicable legal and regulatory provisions, as well as the internal policies and self-regulation instruments adopted;
- (ii) monitor and supervise, with independence and efficiency, the operations and activities carried out by Absoluto Partners and compliance with the applicable standards, especially the rules contained in this Manual;
- (iii) implement Employee Training Programs and other operational procedures that comply with the rules set out in this Manual;
- (iv) implement practices aimed at ensuring the existence of anti-corruption practices in the management company; and
- (v) clarify any doubts Employees may have regarding applicable legislation and regulations, as well as the provisions of this Manual.

The Risk and *Compliance* Officer, pursuant to CVM Resolution No. 21, (i) performs his duties independently from other areas of Absoluto Partners; and (ii) does not perform duties related to the management of securities portfolios, the brokerage and distribution of fund shares or investment classes, securities consulting, or any other activity that limits his independence, either within or outside the institution.

The Chief Risk and *Compliance* Officer, in order to ensure that Absoluto Partners operates in compliance with the rules, standards and guidelines to which it is subject, shall, within the time limits determined by current regulations, periodically evaluate and review its procedures relating to internal controls and *compliance*, in order to implement any updates or improvements.

In addition, the Risk and *Compliance* Officer, together with the internal technology area, will carry out periodic security checks on information systems in order to: (i) preventively minimize possible operational risks and non-compliance with the provisions of the Code of Administration and Management of Third Party Resources, CVM Resolution 21 and this Manual; and (ii) ensure that the technological structure is protected against attempted cyber attacks

Reports of non-compliance with this Manual or any Absoluto Partners policy should be forwarded to the Risk and *Compliance* Officer or, alternatively, use the Manager's Reporting Channel, made available through the *Compliance* system.

3. INTERNAL COMMITTEES

Absoluto Partners has three (3) internal committees: (i) *Compliance* and Ethics Committee; (ii) Investment Committee; and (iii) Risk Committee.

(i) *Compliance and Ethics Committee:*

The *Compliance* and Ethics Committee is ultimately responsible for analyzing compliance with all rules, whether regulatory or self-regulatory, and internal procedures applicable to Absoluto Partners Employees. The *Compliance* and Ethics Committee is completely independent in its functions and its decisions must always comply with the highest degree of good faith and ethical principles.

This committee will be made up of at least 3 (three) members, one of whom must be the Risk and *Compliance* Officer and at least one of the founding partners, Messrs. Jose Zitelmann and/or Mr. Gustavo de Hungria Machado.

The *Compliance* and Ethics Committee shall meet at least once a year on an ordinary basis or on an extraordinary basis when the context so requires. Ordinary meetings must be formalized in minutes, signed by those present and filed by the Risk and *Compliance* Officer on our *Compliance* platform. Decisions will be taken by a majority of the votes of the members present, and the Risk and *Compliance* Officer will have veto power in relation to the matters decided therein.

The *Compliance* and Ethics Committee also deals with issues related to the prevention of money laundering and terrorism financing ("PLDFT").

(ii) *Investment Committee:*

The Investment Committee is responsible for ultimately discussing new investment opportunities, theses and strategies, as well as reviewing the composition of current portfolios and analyzing the strategies implemented.

The Investment Committee shall be composed of at least 2 (two) members, including Messrs. Jose Zitelmann Falcão Vieira and Gustavo de Hungria Machado. Members of Absoluto Partners' analytical team may be invited to participate in the Investment Committee, although the final decision is at the sole discretion of the members. Jose Zitelmann Falcão Vieira and Gustavo de Hungria Machado, both with veto power.

Meetings of the Investment Committee will be held at least once a week and minutes are not required. However, the studies, analyses, reports and *research* on which investment decisions are based must be filed electronically in the internal *OneNote* system or any other system that may be implemented by Absoluto Partners.

(iii) Risk Committee:

The Risk Committee is responsible for managing the risks inherent in the activities carried out by Absoluto Partners. The Risk Committee is also responsible for receiving the *reports*, at the intervals set out in Absoluto Partners' Risk Management Policy, drawn up by the Risk and *Compliance* Officer regarding market, liquidity, operational, counterparty and concentration risks.

The Risk Committee shall be composed of at least four (4) members, one of whom must be the Risk and *Compliance* Officer, a representative from the third-party resource management area, the Risk Manager, and at least one of the founding partners, Mr. Jose Zitelmann and/or Mr. Gustavo de Hungria Machado.

Meetings will be held on an extraordinary basis when the context so demands. Meetings may, at the Committee's discretion, be formalized or not, but when they are, they will be formalized in minutes or by *e-mail* and filed by the Risk and *Compliance* Officer.

4. TRAINING PROGRAMS

TRAINING PROGRAMS

All Absoluto Partners Employees, including its partners and administrators, must participate in the training programs described in this chapter ("Training Programs").

The Training Programs will be of two types: (i) the initial training program ("Initial Training Program") and (ii) the continuous retraining programs ("Continuous Retraining Programs").

The Training Programs will be conducted by the *Compliance* Department, under the supervision of the Risk and *Compliance* Officer. The program may be taught by the Risk and *Compliance* Officer or outsourced to companies specialized in the topics covered in the training. Currently, the programs are carried out through the training platform available on Compliasset, with quizzes to be answered by Employees, without prejudice to the Risk and *Compliance* Officer implementing other training programs.

Employees must undertake, by means of the "Adhesion Agreement" (**Annex I**), to participate in the Continuous Recycling Programs that may be carried out by Absoluto Partners, in accordance with the guidelines of the Risk and *Compliance* Officer.

INITIAL TRAINING PROGRAM

The Initial Training Program will be carried out when new Employees are hired, before they actually start working at Absoluto.

The main purpose of the Initial Training Program will be to introduce new Employees to the activities carried out by Absoluto Partners and its investment philosophy, as well as to provide clarification on the provisions contained in this Manual and other internal rules adopted by the company, including with regard to the functions performed by the Risk and *Compliance* Officer.

In addition, the Initial Training Program aims to ensure that new Employees are fully informed and clear about the procedures and controls to be adopted to ensure proper use of Absoluto Partners' facilities, equipment and files, as well as proper compliance with the rules in this Manual. All new Employees will receive a copy of this Manual.

CONTINUOUS RETRAINING PROGRAMS

The Continuous Retraining Programs will be carried out periodically, at intervals defined by the Risk and *Compliance* Officer, and will involve the participation of Employees in courses, lectures, and training on topics related to the activity carried out by Absoluto Partners, with the aim of promoting the constant updating of Employees' knowledge of applicable legislation, regulations, and self-regulation and any other topics relevant to the performance of their duties and the company's activities.

In this regard, Absoluto Partners will also encourage all its Employees to take part in events relevant to the financial market and specific courses for certain needs.

Absoluto Partners may, at the discretion of its directors, fund professional development courses, provided it deems the content to be taught to be viable and interesting. It is up to the directors responsible for the administrative and financial areas of Absoluto Partners to approve participation in courses, events or lectures by the requesting Employee.

5. ABSOLUTO PARTNERS' INTERNAL POLICIES

This Manual contains the following internal policies of Absoluto Partners:

- (i) Physical and Technological Segregation of Activities Policy;
- (ii) Know Your Client Policy;
- (iii) Prevention of Money Laundering and Terrorist Financing Policy;
- (iv) Policy for Hiring Service Providers;
- (v) Information Security Policy;
- (vi) Cyber Security Policy; and
- (vii) Privacy Policy.

In addition to the policies mentioned above, Absoluto Partners also has the following policies in separate documents:

- (i) Risk Management Policy;
- (ii) Voting Rights Policy;
- (iii) Proration and Order Division Policy;
- (iv) Private Credit Asset Acquisition and Monitoring Policy;
- (v) Certification Manual;
- (vi) Securities Purchase and Sale Policy;
- (vii) Code of Ethics and Conduct; and
- (viii) Business Continuity Plan;
- (ix) ESG Policy;

6. PHYSICAL AND TECHNOLOGICAL SEGREGATION OF ACTIVITIES POLICY

The purpose of the Physical and Technological Segregation of Activities Policy is to establish the rules that guide the physical segregation of facilities between the areas responsible for the activities carried out by Absoluto Partners, in particular the activities of asset and securities portfolio management and other activities that may be carried out by the company. Absoluto Partners only manages third-party funds and does not distribute quotas of funds or investment classes under its management.

In this sense, this policy is adopted on the premise of exclusively carrying out the activity of managing securities portfolios, notably the management of third-party funds.

The Physical and Technological Segregation of Activities Policy must be reviewed and adjusted before any expansion of the scope of Absoluto Partners' activities, referred to in the paragraph above, in order to update the rules and conditions for the development of new activities at its facilities, without violating this policy. In this sense, should Absoluto Partners undertake other activities that require physical segregation from the activity of managing securities portfolios, Absoluto Partners will ensure, through controlled access to physical and electronic environments, that: (i) only Employees directly involved in the management of third party funds have access to the segregated environment in which investment decisions are made and orders to be executed are determined; and (ii) the *Compliance* and Risk Management Areas, due to their *behind-all-barriers* nature, are segregated from the other areas of the institution. Other segregated environments may be created, depending on the legislation and regulations applicable to the activities that may be carried out.

In addition, telephone lines will be recorded, and private network directories restricted to Employees directly involved in the management of third-party funds will be duly segregated from the equipment of other employees.

The networks are directed at specific areas and individuals, according to the *need-to-know* principle, and only the board of directors has access to all directories, since, in line with applicable best practices, management is considered *above all barriers* when it comes to information sharing.

The Risk and *Compliance* Officer is responsible for promoting the application of the rules contained herein, in order to ensure the physical segregation of facilities between areas responsible for the activities provided by Absoluto Partners, when applicable, as well as the segregation of access to networks, directories, and technological information.

CONFLICT OF INTEREST

Absoluto Partners aims to conduct its business always seeking to identify, manage and eliminate the existence of potential conflicts of interest. There is a potential conflict of interest when there is evidence that the personal interest of the Employees (or group of Employees) and/or Absoluto Partners itself overlaps, directly or indirectly, with the interests of Absoluto Partners' clients.

Any circumstance that represents an actual or potential conflict of interest must always be resolved by prioritizing the client over Absoluto Partners and/or its Employees. All Employees must avoid engaging in external business that could represent potential or actual conflicts of interest or that could damage Absoluto Partners' image.

Employees understand that conflicts of interest also extend, in accordance with Article 6 of Annex I of CVM Resolution No. 50, dated August 31, 2021 ("CVM Resolution No. 50"), to the following persons: (i) family members: relatives in the direct line up to the second degree, spouse, partner, stepson, and stepdaughter; and (ii) close collaborators, related parties, in accordance with current legislation and regulations, exclusive investment funds or classes, and non-discretionary investment vehicles, which must comply with the rules established in this Manual, also as a way to prevent conflicts of interest.

Employees may not maintain private business relationships with clients, service providers, partners and competitors in which they may obtain personal privileges as a result of their position or function.

Employees who are investors in funds or classes managed by Absoluto Partners must always act impartially and independently, and may not influence or direct decision-making for personal reasons. They must always be guided by market rules and the

professionalism required by Absoluto Partners, and are aware that the same market and investment rules will apply to them, on a par with those applicable to other investors.

Given that it is difficult to predict every conflict situation, professionals should be sensitive to potential conflicts and bring doubts to the attention of the Risk and *Compliance* Officer. If a conflict cannot be avoided, it must be managed ethically and responsibly, always prioritizing the interests of clients and, if applicable, the provisions of specific regulations on the subject.

Employees must declare to the Risk and *Compliance* Officer any shareholdings they have in small companies, as well as any external activities, even if unpaid, which may generate a conflict of interest with Absoluto Partners, its partners and the shareholders of its investment vehicles. Employees must fill in ANNEX I of our Code of Ethics, registering and formalizing their declaration of conflict of interest and external activities.

All Employees must bear in mind that, in addition to constituting an internal and disciplinary infraction, failure to comply with the rules in this Section and the other rules in this Manual is potentially an administrative, civil and criminal offense and subjects the Employee to internal sanctions, such as a warning or dismissal. Absoluto Partners will maintain a policy of zero tolerance for this type of infraction.

7. **KNOW YOUR CLIENT ("KYC") POLICY**

Absoluto Partners, which only manages equity funds — *i.e.*, without managing portfolios, exclusive or restricted funds or investment classes — understands the importance of the client identification processes carried out by the institutions that are part of the distribution system which, under the terms of the regulations and practices in force, have primary responsibility for the KYC process.

For this reason, Absoluto Partners has implemented a Risk-Based Approach ("RBA") methodology for analyzing institutions authorized to distribute the quotas of its funds and classes, in order to ensure that the institution has solid criteria for: (i) selection of autonomous investment agents, if applicable; and (ii) KYC, PLDFT and anti-corruption processes.

Currently, Absoluto Partners only works with distributors who are members or adhere to ANBIMA and analyzes the information provided by these participants in *due diligence* questionnaires currently carried out by BRE on an ongoing basis, and with recurrence according to the risk of each supplier.

In accordance with CVM Instruction No. 50 and CVM Resolution No. 175, whenever Absoluto Partners assumes primary responsibility for performing the KYC process, whether by legal, regulatory, or contractual determination, the PLD/FTP procedures set forth in this Manual will be adopted, including identification, qualification, registration verification, enhanced diligence when applicable, and ongoing monitoring of clients.

These procedures will be carried out through the BRE platform, observing the operational flows, internal controls, risk criteria and records required by current regulations.

Clients classified as high risk, as well as those who refuse or make it difficult to provide the required information, will only be accepted after analysis by Absoluto Partners' Ethics and Compliance Committee, with the Risk and Compliance Officer having the right to veto. Any high-risk clients will be monitored in a differentiated manner, in accordance with the applicable regulations and self-regulations.

POLICY FOR THE PREVENTION OF MONEY LAUNDERING AND TERRORIST FINANCING

The purpose of this PLDFT policy is to establish internal rules, procedures, and controls related to the prevention of the misuse of Absoluto Partners as an intermediary for the practice of money laundering or concealment of assets, rights, and values, which also comply with the sanctions measures of the UN Security Council (UNSC). Current regulations - in particular Law No. 13.810/2019, Law No. 9.613, of March 3, 1998, amended by Law No. 12.683, of July 9, 2012 ("Law No. 9.613/98") and CVM Resolution No. 50 and complementary rules of Bacen and ANBIMA.

In this sense, Absoluto Partners intends, by instituting this PLDFT policy, to establish and implement procedures and controls designed to:

- (i) reduce the risks that the business, activities and services provided by Absoluto Partners are aimed at money laundering or terrorist financing;
- (ii) constantly monitor, through our *Due Diligence*, the UNSC sanctions lists and identify suspicious operations from the point of view of money laundering and terrorist financing and those that must be reported to COAF/CVM; and
- (iii) support institutions authorized to distribute quotas of their funds and classes in identifying the qualifications and profile of clients, counterparties and others involved in the activities carried out by Absoluto Partners, within the limits of its activities as an asset manager.

Absoluto's PLDFT policy and practices are based on the fact that the manager's activity is low risk, since: (i) it does not distribute quotas of its own funds; (ii) it does not manage exclusive or restricted funds or managed portfolios; and (iii) the vehicles it manages are equity investment funds.

The Risk and *Compliance* Officer has access to all Absoluto Partners directories and data, which allows for the proper monitoring of operations for PLDFT purposes. If any movement is identified by our *Due Diligence (screening)* that in any way touch the list of sanctions published by the UNSC and/or the relevant Brazilian legislation, all activities

carried out with Absoluto will be immediately blocked and the competent authority COAF/CVM will be immediately notified.

Furthermore, Employees are instructed, both in training and through this Manual, to report any suspicious operations and events to the *Compliance* Department, in accordance with current legislation and regulations.

As detailed below, in the process of selecting service providers related to *core* business, the *Compliance* Department analyzes the PLDFT risk.

MONEY LAUNDERING

The crime of money laundering is characterized by carrying out a set of commercial or financial operations with the aim of concealing or disguising the nature, origin, location, disposition, movement or ownership of assets, rights or values derived, directly or indirectly, from a criminal offence.

Generally, the money laundering process consists of three (3) independent phases that often occur simultaneously:

- (i) Placement: entry into the financial system of funds from illicit activities, through deposits, the purchase of financial instruments or the purchase of goods. At this stage, it is common to use financial institutions to introduce ill-gotten funds;
- (ii) Concealment: carrying out multiple financial operations with the funds already entered into the financial system, with the aim of hiding the illegal funds, by means of complex transactions and in large numbers to make it difficult to trace, monitor and identify the illegal source of the money; and
- (iii) Integration: formal incorporation of money into the economic system, through investment in the capital market, real estate, works of art, among others.

FINANCING TERRORISM

The crime of terrorism financing is characterized by the promotion or receipt of funds with the intention of using them, or in the knowledge that they will be used, in whole or in part, to carry out: (i) an act that constitutes a criminal offense under applicable law; or (ii) any other act intended to cause death or serious bodily injury to a civilian, or to any other person not taking an active part in hostilities in a situation of armed conflict, when the purpose of that act, by its nature and context, is to intimidate a population, or to compel a government or an international organization to act or refrain from acting.

KNOW YOUR EMPLOYEE (KYE) PROCEDURES

The purpose of the "Know Your Employee" procedures is to provide Absoluto Partners with detailed information about its Employees, including criteria for hiring them and checking their conduct.

Absoluto Partners adopts a strict and transparent stance when hiring its Employees and, therefore, in addition to the technical and professional requirements, the requirements linked to the Employee's reputation in the market and professional profile will be assessed, as well as the candidate's professional background.

After being hired, as part of the Continuous Retraining Programs, Employees will receive periodic training on PLDFT legislation, regulations and self-regulation, in order to update and improve the practices of Employees in identifying and dealing with situations with signs of PLDFT risk.

KNOW YOUR PARTNER (KYP) PROCEDURES

The "Know Your Partner" procedures cover all Absoluto Partners' business partners, in Brazil or abroad, as well as all its suppliers and service providers.

The purpose of the "Know Your Partner" procedures is to prevent Absoluto Partners from becoming involved in situations that could lead to legal risks and damage its reputation in the market.

Notwithstanding the foregoing, due to their characteristics, both in relation to the counterparty and the markets in which they are traded, transactions involving the assets listed below will not be subject to additional due diligence by Absoluto Partners with regard to monitoring the counterparty:

- (i) initial and secondary public offerings of securities, registered in accordance with the rules issued by the CVM;
- (ii) assets and securities admitted to trading on stock, commodities and futures exchanges, or registered in registration, custody or financial settlement systems, duly authorized in their countries of origin and supervised by a recognized local authority;
- (iii) assets and securities whose counterpart is a financial institution or equivalent; and
- (iv) assets and securities of the same economic nature as those listed above, when traded abroad, provided that (i) they are admitted to trading on stock, commodities and futures exchanges, or registered in a registration, custody or financial settlement system, duly authorized in their countries of origin and supervised by a recognized local authority countries of origin and supervised by a local authority recognized by the CVM, or (ii) whose existence has been ensured by third parties duly authorized to carry out custody activities in countries that are signatories to the Treaty of Asunción or in other jurisdictions, or supervised by a local authority recognized by the CVM.

With regard to KYP, Absoluto Partners, again in line with the ABR methodology, adopts two practices: (i) for business partners related to core activities, such as brokers and trustees, detailed analysis based on the reputation of the company and its partners, as well as *due diligence* through BRE Assessoria de Investimentos, on a recurring basis, which is classified through this *screening* as the level of risk (low, medium, or high) recorded in a dossier, as will be detailed further in the Third-Party Contracting Policy; and (ii) for business partners not related to the core business, such as delivery and cleaning services, a minimum check on the existence and performance of the company, with the possibility of further due diligence, depending on the definition of the Compliance Department.

Business partners associated or adhering to ANBIMA are, in principle, considered low risk. The Chief Risk and *Compliance* Officer may change this classification to medium and high risk at his discretion based on the initial analysis, and may also consider the following elements: (i) the existence of criminal proceedings in which the partners' members and managers are defendants; (ii) news reports pointing to reputational risks related to the partners; (iii) entries in credit risk registers; and (iv) if the partner is an independent brokerage firm.

Finally, Absoluto Partners has a Third Party Hiring Policy, set out in this Internal Controls Manual, which contains processes and requirements for hiring third parties, which helps with the KYP process.

OPERATIONS MONITORING

The operations determined by the Portfolio Management Area are independently monitored by the *Compliance* and Risk Area. In practice, the risk for PLDFT purposes is defined by the type of asset traded and, based on this criterion, the Risk and *Compliance* Officer defines the depth of the monitoring.

By way of example, shares are generally classified as low-risk PLDFT trades, because they are traded on a regulated market and their price formation is more clearly determined. The rule also applies to government bonds and repo operations aimed at liquidity management.

The risk level of the asset, for PLDFT purposes, tends to be medium to high in the case of private credit, depending on the liquidity, issuer and structure of the asset. This is defined by the Risk and *Compliance* Officer and is done on an *ad hoc* basis, as this type of investment is not, in practice and in general, the investment objective of the vehicles managed by the house.

REPORTING TO COAF AND MONITORING RESTRICTIVE LISTS

If the Employee responsible for analyzing the operation comes across any operation in which the hypotheses listed below or any other that may indicate the occurrence of money laundering crimes under Law no. 9.613/98 or terrorist financing, or is notified

through our *Due Diligence* monitoring system of inclusion on restrictive lists or sanctions imposed by the United Nations Security Council (UNSC), provided for in Law 13.810/2019, the operation must be analyzed with special attention and, if considered suspicious, communicated to COAF/CVM, with an immediate freeze being placed on any and all operations:

- (i) Transactions that do not appear to be the result of the client's usual activities or business;
- (ii) Investment or redemption by a shareholder included on the UNSC list or investment operations by a sanctioned entity;
- (iii) transactions whose origin or economic or legal basis cannot be clearly ascertained;
- (iv) transactions incompatible with the client's assets, economic and financial capacity or capacity to generate receivables;
- (v) a transaction with a client whose final beneficiary cannot be identified;
- (vi) a transaction involving a legal entity domiciled in jurisdictions considered by the Action Group against Money Laundering and Terrorist Financing (FATF) to be high risk or with strategic deficiencies. It also involves countries or dependencies considered by the Brazilian Federal Revenue Service (RFB) to have favored taxation and/or privileged tax regimes;
- (vii) Purchase and sale of market assets on behalf of sanctioned companies or custody and settlement of transactions by an entity listed in the sanctions;
- (viii) transactions involving legal entities whose ultimate beneficiaries, partners, shareholders, attorneys, or legal representatives are domiciled in jurisdictions considered by the FATF to be high risk or with strategic deficiencies in preventing and combating money laundering and terrorist financing, or countries or dependencies considered by the RFB to have favorable taxation and/or privileged tax regimes;

- (ix) resistance on the part of the client or other parties involved to supplying information or providing false information or information that is difficult or costly to verify, in order to formalize the registration or record the transaction;
- (x) action by the client or other parties involved, including partners and shareholders, to induce the non-making of the records required by the legislation on the prevention of money laundering and the financing of terrorism;
- (xi) a transaction resulting in a payment which, at the request of the client or others involved, is not made by means of a Brazilian Instant Payment - PIX, Available Electronic Transfer - TED, Credit Document - DOC, transfer between accounts or a registered check;
- (xii) a transaction involving payment to a third party, even when authorized by the client, provided that it is not demonstrably intended for the client's supplier of goods or services, or received from a third party other than the drawee;
- (xiii) payment distributed among several people or using different means;
- (xiv) transactions backed by false securities or receivables or simulated transactions;
- (xv) transactions in which the client dispenses with advantages, prerogatives or special conditions normally considered valuable to any client;
- (xvi) any attempts to circumvent the controls and records required by the legislation on the prevention of money laundering and the financing of terrorism, including by:
 - fractionation;
 - payment in kind;
 - payment by bearer check; or
 - other means;

- (xvii) any other transactions which, considering the parties and others involved, the amounts, method of realization and means and form of payment, or the lack of economic or legal basis, may constitute serious indications of the occurrence of the crimes provided for in Law 9.613/98 and Law 13.810/19, or be related to them.

After an internal investigation, the Compliance Department will report any suspicious transactions to COAF/CVM.

In the absence of communication during the year, a Negative Declaration will have to be sent by the end of April of the following year.

8. POLICY FOR HIRING SERVICE PROVIDERS

Absoluto Partners, in the conduct and best exercise of its activities and responsibility as a securities portfolio manager, may hire third parties, according to their specialties and according to need, to provide the services permitted by the regulations in force.

The purpose of this Service Provider Hiring Policy is to establish the rules and procedures to be observed by Absoluto Partners in the selection and hiring of service providers, pursuant to CVM Resolution No. 21 and CVM Resolution No. 175, of December 23, 2022 ("CVM Resolution No. 175").

The *compliance* department is responsible for conducting and carrying out all the procedures prior to and following the hiring of service providers. In the pre-contracting stages, the *compliance* department must involve the areas directly interested in the service provider's activities, so that they can monitor the contracting process and participate in the selection decision. In the post-contracting stages, in order to adequately carry out the inspection and treatment of non-conformities, the *compliance* department may request the assistance of the areas directly involved with the service provider.

Absoluto Partners is responsible for contracting, on behalf of the funds, classes and subclasses, the following services, as applicable:

- Risk classification by credit risk rating agency;
- Asset portfolio co-management;
- Investment advice;
- Distribution of quotas;
- Closed class market maker; and
- Intermediation of operations for the asset portfolio.

In addition to the services listed above, Absoluto Partners may contract other services on behalf of the fund or class. In this case, such contracting may only be carried out on behalf of the fund or class if provided for in the regulations or authorized by the shareholders' meeting.

ANALYSIS PRIOR TO THE SELECTION AND HIRING OF SERVICE PROVIDERS

Prior to selecting and hiring a service provider, Absoluto Partners must carry out a prior analysis, taking into account the size of the company hired, the volume of transactions carried out and the criticality of the activity.

To this end, the third party hired will undergo our *Due Diligence* and even if it is regulated by the CVM and submits the Anbima questionnaire, it will be followed up and monitored by our internal diligence.

If the contracted service provider is not a market participant regulated by the CVM, or if the service provided is not within the scope of CVM regulation, Absoluto Partners will demand the presentation of corporate and financial documents, certificates issued by public bodies, as well as carrying out internal *due diligence* through our platform with BRE and monitoring it.

With regard to service providers classified as "medium risk", the Risk and *Compliance* Officer will define, on a case-by-case basis, specific procedures for carrying out supervision, taking into account the risk points related to the provider.

Service providers that are classified as high-risk will not be hired by Absoluto Partners. It should be noted that service providers whose activities are self-regulated by ANBIMA and are not associated with or adherent to the ANBIMA Codes of Regulation and Best Practices must necessarily be classified as high risk.

HIRING SECURITIES BROKERS

The Absoluto Partners management area has a duty to its clients to seek the best execution for all operations carried out by the investment funds under its management.

Not only quantitative factors (commissions and fees), but also qualitative factors must be observed when looking for a securities broker to provide the intermediation service for transactions in the asset portfolio, in accordance with the *best execution* criterion. When evaluating best execution, the manager must consider the entire service offering of the evaluated broker, including, among other things, the ability to execute the order, the quality of the *research*, the brokerage charged, and the financial strength of the institution.

Some requirements are essential for the approval of brokers, among which the following stand out:

(i) Experience

- number of operations successfully executed;
- speed of execution of operations;
- agility during periods of high volatility;
- ability to execute differentiated strategies, such as combining different assets, different maturities, options strategies, etc;
- ability to seek liquidity to minimize the cost of the operation in markets with adverse conditions;
- search for opportunities to better execute the order;
- the ability to efficiently execute different types of orders;
- if execution errors occur, the broker must correct these errors satisfactorily and compensate for losses; and
- facility to operate in the *after-market*.

(ii) Infrastructure

- adequate telephony; and

- accurate transaction confirmation reports made available in files formatted in accordance with the requirements of administrators and custodians of investment funds and managed portfolios.

(iii) Ability to provide the following information

- proprietary or third-party *research*;
- access to business, economic or political analysts;
- financial conditions of the brokerage house.

(iv) Financial and Corporate

- checking the financial soundness of the service provider, including analysis of restrictive credit records;
- authorizations required to provide the services contracted;
- adherence to ANBIMA codes;
- unblemished reputation; and
- financial statements.

In the contracting procedures, Absoluto Partners will develop a list of approved brokers and alternative brokers that respect the characteristics listed above, as well as carrying out a systematic and periodic reassessment of the brokers used.

At the end of the analysis, for service providers classified as high risk according to the *Know Your Partner* (KYP) Procedure Section, the Risk and *Compliance* Officer will draw up a report with the result of the analysis with a decision on the hiring of said broker.

HIRING A RESOURCE CO-MANAGER

Absoluto Partners may hire a resource co-manager to assist it in managing the asset portfolio of funds and investment classes, preferably in segments in which Absoluto Partners has little familiarity or when it is necessary to develop a specific investment strategy.

In the hiring process, Absoluto Partners may only select co-managers who adhere to the Code of Administration and Management of Third Party Resources, and must also carry out a check of the co-manager's financial strength, reputation, and authorizations necessary to provide the activity and financial statements. In addition, Absoluto Partners will assess whether the co-manager has: (i) experience in managing investment vehicles in the market covered by the contract; (ii) adequate infrastructure to carry out asset management activities; and (iii) the ability to provide information in a timely manner.

MONITORING SERVICE PROVIDERS

Every year, the *Due Diligence* of our main service providers, whether or not they are regulated by the CVM, is carried out through the contracted platform BRE Assessoria de Investimentos, as long as they are relevant to the case. The Risk *Compliance* Officer will review the documents, processes and information submitted through the Dossier generated by the platform, including information on their structure and operational capacity, in accordance with current regulations. A *black list* may be drawn up with service providers that Absoluto Partners is prohibited from hiring, until *Compliance* reviews the processes and documents again.

If an Employee identifies any signs of non-compliance with contracts, documents or the performance of contracted service providers, they must report them to the Risk and *Compliance* Officer. In turn, the Risk and *Compliance* Officer must investigate the existence of the non-compliance and, if confirmed, adopt the appropriate measures to remedy it, such as requesting its correction by the service provider or arranging for the termination of the contractual relationship.

The Risk and *Compliance* Officer must periodically review the performance of each broker and consider, among other aspects: the quality of the executions provided; the cost of executions, *soft dollar* agreements, always made for the benefit of the investment vehicle, and potential conflicts of interest.

INSPECTION OF SERVICE PROVIDERS

If the service providers are not agents regulated by the CVM or if the service provided to the fund is not within the scope of the CVM, Absoluto Partners must supervise their

activities on a regular basis, according to the frequency and measures to be expressly defined in the service agreement. Supervision should take into account a risk-based supervision methodology, with the aim of paying greater attention to third-party contractors that are more likely to present flaws in their performance or represent a potentially greater damage to investors and to the integrity of the financial and capital markets, under the terms of the *Know Your Partner Policy* above.

9. INFORMATION SECURITY POLICY

CONFIDENTIAL INFORMATION

Absoluto Partners Employees, in the performance of their duties, may have access to various information classified as confidential.

For the purposes of this Information Security Policy, confidential information shall be considered to be any and all information and/or data of a confidential nature (including, without limitation, all technical, financial, operational, economic, and other commercial information) relating to Absoluto Partners, its activities, and its clients, as well as any copies or records thereof, oral or written, contained in any physical or electronic medium, that have been directly or indirectly provided or disclosed as a result of the asset and securities portfolio management activities carried out by Absoluto Partners, even if such information and/or data are not directly related to the services or transactions contemplated herein ("Confidential Information").

The following information is not considered confidential: (i) information that is or becomes public knowledge without violating the provisions of this Information Security Policy; (ii) information received in good faith by the Employee from third parties who have the right to disclose it, without any obligation of confidentiality; (iii) by virtue of law, judicial or administrative decision, must be disclosed to any person; or (iv) whose disclosure has been approved by the Risk and *Compliance* Officer.

In practical terms, Employees are instructed to treat all information as confidential, unless it is indicated, in the document itself or verbally by the *Compliance* Department, that it is classified as "public" – that is, available to any individual, legal entity, or depersonalized entity – or "for internal use" – that is, available to all Employees, without barriers to information established between their areas and activities.

In this sense, all Employees, by signing the Adhesion Agreement attached to this Manual in the form of "**Annex I**", must be aware of and expressly agree to the following:

- (i) Employees expressly undertake to maintain the confidentiality of Confidential

Information that has been transmitted, provided, and/or disclosed to them under or in connection with their employment with Absoluto Partners or their relationship with Absoluto Partners' clients, and undertake not to use, reproduce, or disclose such Confidential Information, including to unauthorized persons or persons who may use it improperly in their own or third parties' investment decision-making processes, except with the express written authorization of the respective owner and to the extent strictly necessary for the performance of their activities and/or obligations;

- (ii) all business, techniques, materials, spreadsheets, forms, projects, strategy developments, products, or services created, developed, and/or used by Absoluto Partners and/or its clients, even if any Employee has significantly contributed to them, will always be the property of Absoluto Partners, and no Employee is permitted to disclose, use them for themselves or third parties, transfer or dispose of them, for any reason whatsoever;
- (iii) Employees expressly acknowledge that Absoluto Partners owns all existing and future copyrights and/or intellectual property rights arising from projects, techniques, strategies, materials, spreadsheets, forms, contract or service developments, methods, and/or systems that currently exist or may be developed during their respective employment with Absoluto Partners, and they may not make any claims in this regard;
- (iv) if any Employee is obliged to disclose Confidential Information by court order or by competent authority, the Employee must inform the Risk and *Compliance* Officer of the existence of such order prior to disclosure and strictly limit himself/herself to the disclosure of the Confidential Information requested;
- (v) for the purposes of this policy, the Employee shall bear the burden of proving the non-confidential nature of any information; and
- (vi) access to Confidential Information will be restricted and may be differentiated according to the hierarchical levels and functions performed by Absoluto Partners' Employees, at the discretion of the manager of each area and with the consent of the Risk and *Compliance* Officer.

Access control to confidential information will be carried out through the Employees' personal passwords, which, as explained here, will follow the criteria defined by the manager of each area, the IT person responsible, together with the *Compliance Officer*, respecting an order of graduation with different levels of accessibility to files, folders, and directories on the corporate network.

If they become aware that any Employee has violated this policy, the other employees are obliged to report this to the *Compliance Officer*, under penalty of being held jointly responsible with the offender.

The *Compliance Officer* is responsible for promoting the application of this policy, as well as controlling, supervising and approving exceptions to it. It is the responsibility of this Board of Directors to ensure that efficient mechanisms are in place to safeguard the secrecy of Confidential Information, as well as to identify any infringements of the rules approved under this policy.

Every Employee is instructed on the duty of confidentiality, not only for compliance with this policy, but especially for perfect compliance with current legislation and regulations. The obligation of confidentiality remains, even in the event of dismissal, in accordance with the rules applicable to Absoluto Partners, the portfolio management activity and, eventually, the personal characteristics of the Employee in question.

INFORMATION SECURITY

All Absoluto Partners Employees are obliged to ensure the confidentiality of Confidential Information and must comply with the following rules:

- (i) Under no circumstances must the professional provide services to Absoluto Partners and even after their contract, transmit or disclose to any person, company, partnership or business, nor use for their own account, without the written approval of Absoluto Partners, any information relating to business and clients received during their relationship with Absoluto Partners, or received from any company directly or indirectly related to it.

- (ii) All data received will be treated as Confidential Information, and the operations carried out and the names of clients must be kept confidential.
- (iii) All client lists, guidance, and data on sales and services, operations and business, as well as all other papers, records, and documents prepared either by the company, the professional, or in their possession during their employment or otherwise relevant to it, must be returned to Absoluto Partners upon termination of the employment contract or at any time, and the reproduction of copies or electronic files with such content is prohibited.
- (iv) Professionals are responsible for the safekeeping and good conservation of any and all documents under their responsibility during the course of their work, and are personally liable in the event of confidentiality being breached by unauthorized persons.
- (v) The professional acknowledges that the violation, in whole or in part, of any of the above items, constitutes grounds for termination for just cause of his/her employment contract with Absoluto Partners and if still in force, in accordance with Article 482, letter "g" of the Consolidation of Labor Laws and with the applicable provisions contained in civil and criminal legislation.
- (vi) Absoluto Partners maintains separate electronic files for each area. The directories of each area are accessed according to the access configuration of each Employee, and Employees of one area are not allowed to view, create, edit, alter or save files stored in the directories of other areas.
- (vii) The password provided for access to institutional data networks, including restricted access directories, is personal and non-transferable and may not be disclosed to other Employees or third parties.
- (viii) Given the highly specialized nature of Absoluto Partners' activities, as well as the principles governing the securities market, it is strictly prohibited to disclose portfolios and investment strategies for any and all products administered and/or managed by the company to anyone who is not a member of Absoluto Partners, whether from the press, personal circle of friends, immediate family,

or civil status, except in accordance with the law and with the authorization of the board of directors.

- (ix) It is also forbidden to use inside information ("*Insider Information*"), meaning material non-public information about publicly traded companies that are part of the potential investment universe of Absoluto Partners' strategies.
- (x) Professionals must protect the company's assets and ensure their efficient use. Assets will be used primarily for business purposes. Any suspicion of fraud or theft of assets must be reported to the Board of Directors immediately. Absoluto Partners' assets include its capital, its facilities, its equipment, proprietary and intellectual information, technology, its "*business plan*", ideas for new products or businesses, and material and client list, among others.
- (xi) The equipment and computers made available to Absoluto Partners Employees must be used with the primary purpose of meeting Absoluto Partners' commercial interests. The use of these work tools for personal purposes is reasonably tolerated by Absoluto Partners, but not encouraged, as set out in the Privacy Policy section.
- (xii) Obtaining copies of files of any length, free of charge or for a fee, on Absoluto Partners computers, originating from a remote machine ("*Download*") must comply with the relevant intellectual property rights such as *copyright*, licenses and patents. Electronic files, programs, or any other materials maintained on the network are considered company assets and are subject to periodic reviews, monitoring, or surveillance by the company.
- (xiii) Absoluto Partners only authorizes access to the internet through approved connections, and professionals cannot use *dial-up* connections or other unapproved means. The professional must use common sense and judgment when using the internet during working hours when this is not in the interests of Absoluto Partners.

Employees may not:

- (i) transmit, copy or *download* any materials, including images, with explicit or non-explicit sexual connotations, or messages or materials containing racist or sexist content, which may embarrass, offend, threaten or harm a professional, a client or the general public.
- (ii) transmit, post, copy, or download *copyrighted* material without the proper consent of the owner of the material;
- (iii) transmit or post non-public information about Absoluto Partners;
- (iv) attempt to gain access to any computer, database or network without proper authorization;
- (v) intentionally transmit viruses or other unauthorized programs;
- (vi) distribute e-mail messages that constitute chain letters, spam, advertisements, etc;
- (vii) create an e-mail address or domain that is derived from or similar to the name of Absoluto Partners;
- (viii) the use of passwords is confidential and they must not be distributed or communicated to third parties under any circumstances;
- (ix) use of Absoluto Partners e-mail should be done with good judgment; and
- (x) all electronic communication related to the business must be made through Absoluto Partners' communication network, and it is not permitted to send documents, programs or other files through "*hotmails*" or other servers that can be accessed via the Internet.

The electronic mail provided by Absoluto Partners is characterized as corporate electronic mail for all legal purposes, especially those related to labor rights, and is preferably used to achieve the business purposes for which it is intended

However, messages sent or received via corporate email, their respective annexes, and internet browsing through Absoluto Partners equipment may be monitored without any notice to the professional.

No professional is authorized to speak to the public, give interviews, provide information or the like, be it the Press, written or spoken, regulators, inspectors, this function being the exclusive responsibility of the Board of Directors or someone explicitly approved by the board of directors.

The rules set out in this policy aim to establish rules that guide the control of access to Confidential Information by Employees, including the establishment of rules for the use of company equipment and e-mails, for saving copies of files, for *downloading* and installing programs on company computers, among others.

As required by the regulations applicable to portfolio management activities and current best practices, all information processed by Absoluto Partners will be stored for at least five (5) years from the end of the relationship with a given client or counterparty, the transaction date, or the maturity date of a given transaction, as applicable. A longer period may be established by the *Compliance* and Risk Officer, whenever required by law or recommended as a result of the general limitation period provided for in the Civil Code.

10. CYBER SECURITY POLICY

Technological advances create facilities and enable the use of new tools for Absoluto Partners' operations, allowing agility in the construction and provision of services, and expansion of means of communication, among other advances. On the other hand, the increased use of such tools increases the risks of cyber attacks, threatening the confidentiality, integrity and availability of Absoluto Partners' data or systems.

With this in mind, the purpose of this Cyber Security Policy is to mitigate the risks of a cyber threat by implementing a cyber security program that includes the following aspects: (i) identification and assessment of the internal and external risks to which Absoluto Partners is subject, the *hardware* and software assets and the processes that need protection; (ii) establishment of prevention and protection actions; (iii) implementation of a cyber security program. (ii) establishing prevention and protection actions; (iii) monitoring and testing; (iv) creating a response plan; and (v) recycling and reviewing the cybersecurity program; based on the Cybersecurity Guide provided by Anbima

The Risk and *Compliance* Officer will be responsible for dealing with and answering questions related to cyber security.

Any process or asset classified as Confidential Information will be considered vulnerable for cyber security purposes, being internally classified as having a high degree of institutional threat in the event of a possible cyber attack.

In this sense, *Compliance*, together with Absoluto Partners' technology department, carries out actions to prevent and protect these assets, through the procedures listed in the Information Security and Confidentiality Policy. In addition, it should be noted that Absoluto Partners works with (i) *periodic automatic backups* of its files; (ii) a *firewall* and antivirus system; (iii) restrictions on the installation and execution of unauthorized software and applications through process execution controls; and (iv) a *whitelist*-based firewall filter. (v) Segregated VLANs.

For monitoring purposes, Absoluto Partners' technology department may carry out security tests and procedures to detect flaws and vulnerabilities. Additionally, Absoluto

Partners (i) maintains up-to-date inventories of hardware and software it owns; (ii) keeps operating systems and application software up-to-date at all times, installing updates whenever they become available; (iii) monitors *backup* routines on a daily basis, carrying out regular data restoration tests; and (iv) regularly analyzes the logs and audit trails created, in order to enable the rapid identification of attacks, whether internal or external.

In the event of a successful cyber attack on Absoluto Partners' networks, *Compliance* and Absoluto Partners' technology department must immediately contact key Absoluto Partners Employees and a specialized company to resolve the issue in the shortest possible time. In this scenario, Absoluto Partners Employees must use contingency facilities until services are normalized, which will comply with the access control rules set out in the Information Security and Confidentiality Policy.

In the event of an individual attack on a particular Employee, Absoluto Partners must make new equipment available for that Employee to continue providing services.

Any and all cyber incidents must be documented in writing in a report drawn up by *Compliance*, which will include descriptions of the incident and the measures taken by Absoluto Partners to resolve the incident, and must be filed in our compliance software, *Compliasset*, for evidence purposes in the event of any questions.

The procedures set out in this Cybersecurity Policy, as mentioned above, will be reviewed periodically by Absoluto Partners, or when there is a change in regulation regarding cybersecurity. In such reviews, the risk, vulnerability and threat assessments originally identified will be updated.

11. BUSINESS CONTINUITY MANAGEMENT (BCM) POLICY

The purpose of this policy is to establish guidelines, procedures and responsibilities to ensure that the company's critical operations are restored in the shortest possible time in the event of any kind of significant interruption or improper access to our systems, data or physical facilities. The focus is on ensuring the continuity of essential activities ("core business"), preserving the integrity of information, the safety of people and the trust of clients, partners and other *stakeholders*.

11.1. Responsibility Structure

- Risk and *Compliance* Officer: responsible for the overall coordination of the continuity plan, including the initial analysis of the incident, classification of the event and strategic decision-making.
- Technology Area: works together with the Risk and *Compliance* Officer in the technical assessment of the incident, proposing mitigation solutions and implementing the necessary measures to ensure operational resumption.
- Key Employees (*Core Business*): previously designated and trained employees who have prepared workstations (secure desktop at home), ensuring that critical activities can be conducted in adverse scenarios.

11.2. *Business Impact Analysis* (BIA) and *Business Continuity Planning* (BCP)

The continuity process is structured in three main stages:

1. Assessment and Execution: identifying the severity of the event and immediately defining the next steps;
2. Restoring the *Core Business*: resumption of essential activities through redundancies or the actions of key employees;
3. Full Restoration: full normalization of operations, including support areas and non-critical activities.

11.3. Incident classification

Events are categorized according to their impact and complexity:

- Level 1 - Simple: low impact incidents, resolved quickly with contingency measures. Example: momentary internet link outage or power interruption for up to 4 hours.
- Level 2 - Intermediate: incidents that require remobilization of the Core Business to guarantee the company's operation. Example: small fire in part of the building, power outage of more than 4 hours.
- Level 3 - Disaster: large-scale events that require the relocation of teams and resources for an indefinite period of time. Example: floods, major fires.

11.4. Response Procedures

Each incident will follow a previously defined **Incident Response Plan (IRP)**, including:

- Immediate activation of the response team;
- Internal and external communication (employees, clients and critical suppliers);
- Complete documentation of the event, the actions taken and the results achieved;
- Post-incident evaluation, identifying points for improvement.

11.5. Records and evidence

All events and respective actions will be duly recorded in *compliance* systems, generating formal evidence for regulatory, contractual and continuous improvement purposes.

11.6. Review and Continuous Improvement

The BCM program will be reviewed periodically, updating risk analyses, reinforcing protection measures, simulation tests and team training. The aim is to ensure resilience, adaptability and rapid response to any adverse scenarios.

12. PRIVACY POLICY

The purpose of this Privacy Policy is to establish the rules, procedures and internal controls related to the processing of personal data by Absoluto Partners, in accordance with the provisions specified in Federal Law No. 13,708, of August 14, 2018, as amended ("General Data Protection Law" or "LGPD").

Absoluto Partners, as the controller and operator of personal data, processes personal data exclusively for the proper performance of its business activity. The shared use of data with the fiduciary administrator and other service providers of the investment vehicle is possible, whether for the correct exercise of management activities or as a result of regulatory obligations or best practices applied to the sector.

The *Compliance* and Risk Officer is the *Data Protection Officer* (DPO). Questions, complaints and requests regarding the LGPD can be addressed to dpo@absolutopartners.com.br.

Personal data is any information related to identified or identifiable natural persons, which may be sensitive in nature if it relates to racial or ethnic origin, religious beliefs, political opinions, membership of a trade union or religious, philosophical, or political organization, data concerning health or sex life, genetic or biometric data, when linked to an identified or identifiable natural person.

Absoluto may process personal data—*i.e.*, collect, produce, receive, classify, use, access, reproduce, transmit, distribute, process, file, store, delete, evaluate, or control information, modify, communicate, transfer, disseminate, or extract—based on one or more of the following grounds permitted by the LGPD:

- (i) compliance with a legal or regulatory obligation;
- (ii) legitimate interest of the owner of the personal data, the entity to which it is linked or Absoluto Partners;
- (iii) performance of a contract or preliminary steps to a contract;

- (iv) use in judicial, administrative or arbitration proceedings; and
- (v) consent of the holder of the personal data.

In practice, the following personal data may be processed by Absoluto Partners on a routine basis: (i) shareholder data, when provided by the distributor or trustee, for the purposes of monitoring and complying with regulatory *reports*, as well as in the legitimate interest of these investors (with regard to verifying the composition of the liabilities of vehicles for liquidity management); (ii) Employee data, for compliance with legal obligations related to the type of relationship—employment, corporate, or internship—and regulatory obligations related to KYE practices, as well as in the interest of these Employees in the case of health-related data if such data is provided to Absoluto in the interest of the Employee; (iii) personal data of Employees or persons linked to service providers, in compliance with KYP obligations; (iv) public data of administrators, partners, and senior management of investee companies; and (v) data of candidates for positions at the management company, as a preliminary procedure for future hiring and also in the interest of the candidate.

Unintentionally, Absoluto Partners mapped out the hypothesis of collecting personal data, including sensitive ones, from Employees who use the manager's technological structure and available means of communication - telephones, corporate *emails*, individual directories, and messaging systems - to store or treat personal information.

As stated in the Information Security section, Absoluto Partners, on the grounds of reasonableness, does not strictly prohibit the use of its technology tools by Employees who, from time to time, need them to resolve a specific personal matter.

However, Employees who do so must bear in mind that Absoluto Partners is a regulated company and must have strict controls over data relating to the business and its operation, including the legal and regulatory obligation to store this data and ensure its integrity.

Thus, data of Employee or individuals in any way connected to them that are transmitted through the network, software, *hardware*, or applications of Absoluto Partners may, either due to technological limitations, or due to legal and regulatory imposition, not be

subject to erasure or even of mapping by Absoluto Partners, as the “treatment” of these by the manager was involuntary and in no way related to its business activity.

With the exception of all the legal and regulatory hypotheses that, by criterion of specificity, overlap with the LGPD, it is the right of the holder of personal data to request the DPO:

- (i) confirmation of the existence of processing;
- (ii) access to data;
- (iii) correction of incomplete, inaccurate or outdated data;
- (iv) anonymization, blocking or deletion of unnecessary, excessive data or data processed in breach of the provisions of this Law;
- (v) portability of data to another service or product provider, upon express request and with due regard for commercial and industrial secrets, in accordance with the regulations of the controlling body;
- (vi) portability of data to another service or product provider, upon express request, in accordance with the regulations of the national authority, observing commercial and industrial secrets;
- (vii) deletion of personal data processed with the consent of the data subject, with the exception of cases in which it is permitted to refuse such a request;
- (viii) information on the public and private entities with which the controller has shared data;
- (ix) information on the possibility of not providing consent and the consequences of refusing;
- (x) revocation of consent, where applicable.

OTHER CONSIDERATIONS

Any questions or requests for clarification related to this Manual or any other internal policies of Absoluto Partners can be addressed to the *Compliance* Department.

Exceptions to this Manual, provided they are not prohibited by applicable legislation or regulations, will be analyzed by the *Compliance* Officer and submitted to the Compliance and Ethics Committee.

This Manual was revised in January 2026 and approved by the Board of Directors in January 2026, when it came into force. Its use classification is: public document.

ANNEX I

ADHESION AGREEMENT TO THE INTERNAL CONTROLS AND *COMPLIANCE* MANUAL AND OTHER INTERNAL POLICIES OF ABSOLUTO PARTNERS GESTÃO DE RECURSOS LTDA.

I, [●], bearer of Identity Card No. [●], registered with the CPF under No. [●], hereby declare for all due purposes that:

- (i) have received an updated version of the Internal Controls and *Compliance* Manual and other internal policies ("Policies") of **ABSOLUTO PARTNERS PARTNERS GESTÃO DE RECURSOS LTDA.** ("Manager"), whose rules and policies have been explained to me in advance and in relation to which I have had the opportunity to clear up all existing doubts, having also read and understood all the guidelines set out in such documents, undertaking to fully comply with their terms in the performance of my duties;
- (ii) I am aware that the Policies become part of my duties as an Employee of Manager, and are incorporated into the other rules of conduct adopted by Manager.
- (iii) I am aware of Absoluto Partners' Information Security Policy and I expressly authorize Absoluto Partners to record all conversations over the company's telephone lines, as well as to monitor all communications made via corporate email, internet, *chat*, etc.
- (iv) I understand that, as of this date, failure to comply with the terms set out in the Policies may result in serious misconduct, which may be subject to the application of applicable penalties, including dismissal for just cause.
- (v) On [●] of [●], I participated in the specific training carried out in accordance with the provisions of the Internal Controls and *Compliance* Manual, and I fully understood the rules established in the Policies, as well as in the legislation and regulations in force, committing myself to fully observe the terms and conditions presented to me.

- (vi) I consent to the processing of my personal data by Absoluto Partners, including information relating to my health and that of my family, in the case of forms intermediated by the institution. I also declare that any personal data of mine or of people with whom I have a relationship, which is processed or stored in messaging systems, e-mails, telephones, networks, directories, clouds or any other *software, hardware* or applications, will be processed by Absoluto Partners. any other software, hardware or applications of Absoluto Partners by my action or omission, for the timely resolution of personal issues, do not have any right to erasure. The processing (in the sense defined by the LGPD) of such personal data by Absoluto Partners is involuntary and the legal and regulatory duty of the manager to maintain audit trails and integrity of data relating to its business activity prevails for all purposes.
- (vii) I commit, in particular, to:
- declare to the *Compliance* and Risk Officer any situations, even if only potentially or apparently, which may generate a conflict of interest with Absoluto Partners or the investors in the vehicles managed;
 - keep all data owned or processed by Absoluto Partners strictly confidential;
 - follow rules to prevent money laundering, terrorist financing and anti-corruption practices;
 - immediately report any non-compliance with Absoluto Partners' internal policies to the *Compliance* and Risk Officer;
 - ensure that my opinions and actions in civil society, including in the virtual environment, are not confused with those of Absoluto Partners, in particular, but not limited to, political party issues, participation in or support for non-governmental organizations and civil initiatives, membership in political parties, bodies, and associations; and
 - reimburse Absoluto Partners, its partners or investors, as applicable, for any damage resulting from my failure to comply with Absoluto Partners' internal policies, without prejudice to administrative and criminal sanctions that may be applicable to me.

Rio de Janeiro/RJ, [●] of [●] of [●].

[●]