

Dated July 29, 2024

**POLICY FOR TRADING SECURITIES ISSUED BY BRISANET SERVIÇOS DE  
TELECOMUNICAÇÕES S.A.**

Corporate Taxpayer ID (CNPJ) nº 04.601.397/0001-28  
Company Register (NIRE) 23.3.0004573-4  
Publicly Held Company

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Annex I Draft of the Term of Adherence to the Negotiation Policy

## 1 INTRODUCTION AND GENERAL PRINCIPLES

- 1.1** **BRISANET SERVIÇOS DE TELECOMUNICAÇÕES S.A.** (“**Company**”) is a publicly held company, committed to the good corporate governance practices of the B3 trading segment (as defined below) called “Novo Mercado” and is concerned with ensuring high standards of transparency and fair treatment of investors and the capital market in general.
- 1.2** This document sets out the Trading Policy (as defined below), prepared in accordance with CVM Resolution 44 (as defined below).
- 1.3** This Trading Policy has been approved by the Board of Directors and is based on the following basic principles:
- (i) compliance with specific legislation, CVM regulations (as defined below) and other regulatory bodies to which the Company is subject;
  - (ii) adherence to best investor relations practices; and
  - (iii) transparency and fair treatment of investors and the capital market in general.
- 1.4** Knowledge of and strict compliance with this Trading Policy is mandatory for all Related Persons (as defined below). Any doubts about the provisions of the Trading Policy, the applicable regulations issued by the CVM or other national and foreign regulatory bodies to which the Company is subject should be clarified with the Investor Relations Officer.
- 1.5** All Related Persons, and those who may acquire this condition, must formalize their adherence to this Trading Policy by signing the Trading Policy Adherence Agreement, in accordance with the model in **Annex I** of this document.

## 2 DEFINITIONS

- 2.1** In the application and interpretation of the terms and conditions contained in this Trading Policy, the terms listed below shall have the following meanings:

**“Controlling Shareholder”** The shareholder or group of shareholders bound by a shareholders' agreement or under common control that exercises direct or indirect power of control over the Company, under the terms of the Brazilian Corporation.

**“Administration”** Members of the Board of Directors and the Board of Executive Officers.

**“Relevant Act or Fact”** Any decision of the Controlling Shareholder, resolution of the General Meeting or of the Company's management bodies or any other act or fact of a political-administrative, technical, legal, business or economic-financial nature occurring or related to the Company's business, which may have a significant influence on (i) the price of Securities issued by the Company or referenced thereto;

(ii) the decision of investors to buy, sell or hold Securities issued by the Company; or (iii) the decision of investors to exercise any rights inherent to the condition of holders of Securities issued by the Company, or referenced thereto. A Relevant Act or Fact is also considered to be the examples listed in article 2, sole paragraph, of CVM Resolution 44.

<b>“B3”</b>	B3 S.A. – Brasil, Bolsa, Balcão.
<b>“Stock Exchanges”</b>	B3 and any other stock exchanges or organized over-the-counter market entities on which the Company has Securities admitted to trading, in Brazil or abroad.
<b>“CNPJ”</b>	National Register of Legal Entities of the Ministry of Finance.
<b>“Company”</b>	Brisanet Serviços de Telecomunicações S.A.
<b>“Fiscal Council Members”</b>	Members of the Audit Board, members and alternates.
<b>“Board of Directors”</b>	The Company's Board of Directors.
<b>“Fiscal Council”</b>	The Company's Fiscal Council, if installed.
<b>“Commercial contacts”</b>	Any person who has knowledge of information relating to a Material Act or Fact of the Company, especially those who have a commercial, professional or trust relationship with the Company, such as independent auditors, securities analysts, consultants and institutions that are part of the securities distribution system.
<b>“CPF”</b>	Registry of Individuals of the Ministry of Finance.
<b>“CVM”</b>	The Securities and Exchange Commission.

<b>“Investor Relations Officer”</b>	The Company Director Officer responsible for providing information to the investing public, the CVM and the Stock Exchanges, among other duties provided for in the regulations issued by the CVM, as well as for managing and monitoring the application of this Trading Policy.
<b>“Employees with Access to Material Information”</b>	The employees of the Company who, because of their office, function or position in the Company, have access to any Material Information.
<b>“Material Information”</b>	All information related to the Company or its Controlled Companies that may significantly influence the quotation of the Securities and that has not yet been disclosed to the market.
<b>“Brazilian Corporation Law”</b>	Law n° 6.404 of December 15, 1976, as amended.
<b>“Bodies with technical or advisory functions”</b>	Any bodies of the Company with technical or advisory functions, created by statutory provision.
<b>“Country”</b>	Means the Federative Republic of Brazil.
<b>“Related Persons”</b>	Persons who have the following relationships with Directors, Audit Board Members and members of any Technical or Advisory Bodies: (i) their spouse, from whom they are not legally or extrajudicially separated; (ii) their partner; (iii) any dependent included in the annual income tax return; and (iv) companies directly or indirectly controlled by them.
<b>“Related Persons”</b>	The Company, its Controlling Shareholders, Managers, Audit Board Members, Employees with Access to Privileged Information, members of any Technical or Advisory Bodies, Business Contacts, as well as Subsidiaries, and any person who has knowledge of information relating to a Material Act or Fact due to their position, function or position in the Company, its Controlling Shareholders or its Subsidiaries and Affiliates.

<b>“Trading Policy”</b>	This Trading Policy for Securities Issued by the Company.
<b>“CVM Resolution 44”</b>	CVM Resolution No. 44, of August 23, 2021, as amended, which provides for the disclosure of information about a material act or fact, the trading of securities pending an undisclosed material fact and the disclosure of information about the trading of securities.
<b>“Affiliated Companies”</b>	Companies in which the Company has a stake of 20% (twenty percent) or more, without controlling them.
<b>“Controlled Companies”</b>	Companies in which the Company, directly or through other controlled companies, holds partner/shareholder rights that grant it the power of control, under the terms of the Brazilian Corporation Law.
<b>“Adhesion Agreement”</b>	Agreement to adhere to this Trading Policy, in the form of <b><u>Annex I</u></b> , to be signed in accordance with article 17, paragraph 1, of CVM Resolution 44.
<b>“Securities”</b>	Any shares, debentures, real estate receivables certificates, subscription warrants, receipts and subscription rights, promissory notes, call or put options or derivatives of any kind, or, further, any other securities or collective investment contracts issued by the Company or referenced to them that, by legal determination, are considered "securities", existing on the date of approval of this Disclosure Policy or that may be subsequently created.

### **3 PURPOSE AND SCOPE**

- 3.1** The purpose of this Trading Policy is to curb and punish the use of Inside Information by Related Persons for the purpose of gaining an advantage, for themselves or for others, in trading in Securities and to set out the guidelines that will govern, in an orderly manner and within the limits established by law, the trading of such Securities, under the terms of CVM Resolution 44 and the Company's own internal policies, in order to ensure transparency in trading.

**3.2** These rules also seek to curb insider trading (improper use of Inside Information for one's own benefit or for the benefit of third parties) and tipping (tipping of Inside Information so that third parties can benefit from it), preserving transparency in securities trading.

**3.3** This Trading Policy is based on:

- (i) the Law No. 6.385, of December 7, 1976, as amended;
- (ii) the Brazilian Corporate Law;
- (iii) CVM Resolution 44; and
- (iv) B3's Novo Mercado Listing Regulations.

#### **4 RELATED PARTIES**

**4.1** The rules of this Trading Policy define periods in which Related Persons must refrain from trading in Securities to avoid being questioned regarding the misuse of Inside Information.

**4.2** In addition to Related Persons, the rules of this Trading Policy apply to trades carried out, directly or indirectly, by Related Persons, on their own account or on behalf of third parties, inside or outside regulated securities markets, including in cases where such trades take place through:

- (i) related People;
- (ii) attorneys or agents;
- (iii) persons or entities who, by virtue of law, are prevented from trading in the Securities for a certain period, as applicable;
- (iv) securities lending operations;
- (v) third parties with whom they have entered into a trust or portfolio management agreement; and/or
- (vi) any person who has had access to Insider Information through any of the persons prohibited from trading, knowing that such information has not yet been disclosed to the market.

**4.3** Related Persons must ensure that their Business Contacts and those with whom they have a business, professional or trust relationship do not trade Securities when they have access to Inside Information. To this end, Related Persons must adhere to this Trading Policy by signing the respective Terms of Adhesion.

**4.4** The Related Persons, by signing the Adhesion Agreement, undertake to make this Trading Policy known to their Related Persons, who will also be subject to its terms.

**4.5** The Investor Relations Officer is responsible for the general administration of this Trading Policy. Any doubts about the provisions of this Trading Policy should be clarified with the Company's Investor Relations Officer.

## **5 RESTRICTIONS ON TRADING PENDING DISCLOSURE OF A RELEVANT ACT OR FACT**

**5.1** No Related Person may trade Securities issued by the Company at any time, regardless of the determination of the Investor Relations Officer, until the Inside Information to which such person has access or knowledge is disclosed to the market in the manner established in CVM Resolution 44.

**5.2** The following matters are deemed relevant for the purposes of the definition of Inside Information, from the moment the respective studies or analyses begin and until their disclosure to the market in the manner established in CVM Resolution 44:

- (i) information about mergers, total or partial spin-offs, mergers, transformations, or any form of corporate reorganization or business combination;
- (ii) change in control of the Company, including through the execution, amendment or termination of a shareholders' agreement;
- (iii) decision to cancel the Company's registration as a securities issuer with the CVM;
- (iv) change in the trading environment or segment for shares issued by the Company; and
- (v) information on requests for judicial or extrajudicial reorganization and bankruptcy made by the company itself.

**5.3** It is important to highlight that, pursuant to CVM Resolution 44, the presumption set forth in item 5.2 above is relative and must be analyzed in conjunction with other elements that indicate whether, in fact, there has been a violation of the restriction set forth in item 5.1 above.

## **6 RESTRICTIONS ON TRADING AFTER THE DISCLOSURE OF A RELEVANT ACT OR FACT**

**6.1** For the purposes of item 5.1 above, even after the disclosure of a Material Act or Fact, the period of restriction on trading in Securities by Related Persons will continue to prevail, if this may - in the Company's judgment, as decided by the Investor Relations Officer - interfere in the conditions of business with Securities, in such a way as to result in damage to the Company itself or its shareholders. In such cases, whenever the Company decides to maintain the said restriction period, the Investor Relations Officer will disclose this decision to the Related Persons.

## **7 EXCEPTIONS TO THE GENERAL RESTRICTIONS ON SECURITIES TRADING**

**7.1** Desde que observados os requisitos previstos na regulamentação vigente (em especial na Resolução CVM 44), as restrições à negociação de Valores Mobiliários, nos termos do item 5.1 acima, não se aplicam às seguintes operações:

- (i) acquisition, through private trading, of treasury shares resulting from the exercise of call options in accordance with the stock option plan approved at the Company's General Meeting;



- (ii) transfer of shares granted by the Company to Directors, employees or service providers as part of the remuneration under the share-based remuneration plan approved at the General Meeting;
- (iii) trades involving fixed-income securities, when carried out by means of operations with combined commitments of repurchase by the seller and resale by the buyer, for settlement on a pre-established date, prior to or equal to the maturity of the securities that are the object of the operation, carried out with predefined profitability or remuneration parameters;
- (iv) subscription of new Securities, without prejudice to the application of the rules governing the disclosure of information in the context of the issue and offer of such Securities;
- (v) trades carried out by investment funds in which Related Persons and/or Connected Persons are shareholders, provided that the trading decisions of such investment funds cannot be influenced by shareholders who are Related Persons and/or Connected Persons; and
- (vi) trades carried out by Related Persons and/or Connected Persons in accordance with an individual investment or divestment plan, under the terms of item 11 below.

## **8 PROHIBITION TO TRADING IN A PERIOD PRIOR TO THE DISCLOSURE OF QUARTERLY INFORMATION AND STANDARDIZED FINANCIAL STATEMENTS**

**8.1** The Company, the Controlling Shareholders, the Managers, the Audit Board Members and the members of the Bodies with Technical or Advisory Functions are prohibited from trading in Securities, regardless of any notice/alert from the Investor Relations Officer, in the period of fifteen (15) days prior to the disclosure of the Company's quarterly accounting information and annual financial statements, regardless of the knowledge, by such persons, of the content of the Company's quarterly accounting information and annual financial statements or the verification of the existence of Inside Information pending disclosure.

**8.1.1** The restriction provided for in item 8. 1 above does not apply (i) to individual investment or disinvestment plans that meet the requirements set out in article 16 of CVM Resolution 44, under the terms of item 11 below; (ii) to trades involving fixed-income securities, when carried out by means of transactions with combined repurchase commitments by the seller and resale commitments by the buyer, for settlement on a pre-established date, prior to or equal to the maturity of the securities which are the subject of the transaction, carried out with predefined profitability or remuneration parameters; and (iii) transactions aimed at fulfilling obligations assumed before the start of the lock-up period arising from securities loans, the exercise of call or put options by third parties and forward purchase and sale contracts.

**8.1.2** It should be noted that Affiliated Persons not included in the prohibition set forth in item 8.1 above shall be subject to the prohibition on trading Securities if they become aware of the content of the Company's quarterly accounting information and annual financial statements, pursuant to the provisions of item 5.1 above.

## **9 PROHIBITION ON TRADING APPLICABLE TO FORMER DIRECTORS**

- 9.1** Former Directors who leave the Company's management prior to the public disclosure of a Material Act or Fact relating to a business or fact initiated during their period of management may not trade Securities for a period of three (3) months after their departure or until the said Material Act or Fact has been disclosed, whichever occurs first.

## **10 DUTY TO INFORM**

- 10.1** Controlling Shareholders, Managers, Audit Board Members and members of Technical or Advisory Bodies must disclose their ownership of Securities and, in the case of public companies, of securities issued by Subsidiaries or Controlling Shareholders, either in their own name or in the name of Related Persons, in compliance with the terms of the Company's Policy on Disclosure of Material Acts and Facts.

## **11 INDIVIDUAL TRADING PLANS**

- 11.1** Affected Persons may formalize, in writing, before the Investor Relations Officer, individual investment or divestment plans governing their dealings in Securities, provided that the requirements and characteristics set out in article 16 of CVM Resolution 44 are complied with.

**11.1.1** In addition to the above, the individual investment or divestment plan must (i) be verifiable, including as regards its preparation and the making of any changes to its content; (ii) establish, on an irrevocable and irrevocable basis, the dates or events and the amounts or quantities of the transactions to be carried out by the participants; and (iii) provide for a minimum period of 3 (three) months for the plan itself, any modifications and cancellations to take effect.

- 11.2** The investment or divestment plans instituted by the Related Persons may allow the trading of Securities in the period referred to in item 8 of this Trading Policy, provided that (i) the Company has approved a schedule defining specific dates for the disclosure of quarterly accounting information and annual financial statements; and (ii) oblige its participants to revert to the Company any losses avoided or potential gains earned on trades in Securities, arising from any change in the dates of disclosure of quarterly accounting information and annual financial statements, determined by reasonable and verifiable criteria defined by the plan itself.

- 11.3** It is prohibited for Related Parties to: (i) maintain more than one investment or divestment plan in effect simultaneously; and (ii) carry out any transactions that cancel or mitigate the economic effects of the transactions to be determined by the investment or divestment plan.

- 11.4** The Board of Directors shall be responsible for verifying, at least every six months, the adherence of the trades made by the Related Persons to their respective formalized investment or divestment plans, as the case may be.

## **12 AMENDMENTS TO THE SECURITIES TRADING POLICY**

**12.1** This Trading Policy may be amended in the following situations:

- (i) when there is an express determination in this sense by CVM;
- (ii) in the event of a change in the applicable legal and regulatory rules, to implement the necessary adaptations; or
- (iii) if approved by the Board of Directors.

**12.2** Without prejudice to further investigation and sanctions, CVM may determine the improvement or the alteration of this Policy if it understands that its content does not impede the use of relevant information in the realization of the negotiation, or if it understands that it does not adequately meet the applicable legislation.

**12.3** The change of this Trading Policy must be communicated to the CVM and to the Stock Exchanges by the Investor Relations Director, in the manner required by applicable regulations, and must also be communicated to Related Persons.

**12.4** This Trading Policy may not be altered pending the disclosure of a Material Act or Fact that has not yet been disclosed, unless expressly determined by law.

## **13 VIOLATION OF THE TERMS OF THIS TRADING POLICY**

**13.1** The Related Persons responsible for non-compliance with any provision of this Trading Policy undertake to fully indemnify the Company and/or other Related Persons for any losses they may incur arising directly or indirectly from such non-compliance.

**13.2** Failure to comply with this Trading Policy will subject the offender to disciplinary sanctions, as well as any applicable administrative, civil and criminal sanctions imposed by the market regulators, without prejudice to compensation for losses and damages caused to the Company and its shareholders by the violation of the rules contained in this policy. However, the Board of Directors shall be responsible for taking any disciplinary measures that may be appropriate within the Company, including removal from office or dismissal of the offender in the event of a serious breach.

**13.3** Any person who adheres to the Trading Policy and becomes aware of its violation must immediately report the fact to the Investor Relations Officer.

**13.4** The provisions of this Trading Policy do not exclude the liability arising from legal requirements of third parties not directly related to the Company who become aware of Material Acts or Facts and trade in Securities issued by the Company.

**13.5** If the appropriate measure falls within the legal or statutory competence of the General Meeting, the Board of Directors shall convene it to decide on the matter.

## **14 VIGENCY**

**14.1** This Trading Policy shall come into force on the date the CVM approves the Company's application for registration as a category "A" securities issuer and shall remain in force for an indefinite period, until further notice.

## **15 GENERAL PROVISIONS**

- 15.1** Any violation of the provisions of this Trading Policy shall be subject to the legally applicable procedures and penalties, including the punishments provided for by law, in addition to liability for losses and damages caused to the Company and/or third parties.
- 15.2** The unauthorized disclosure of non-publicly disclosed Inside Information about the Company is harmful to the Company and is strictly prohibited.
- 15.3** Upon signing the term of office of new directors, fiscal councilors, and members of technical or advisory bodies, the signature of the Terms of Adherence as per **Annex I** shall be required, and they shall be made aware of this Trading Policy."
- 15.4** Any violations of this Trading Policy by Related Persons must be reported immediately to the Company's Investor Relations Officer.
- 15.5** The Company shall keep at its head office, at the disposal of the CVM, a list of the persons who sign the Adhesion Agreement and their respective qualifications, indicating position or function, address and CNPJ or CPF registration number, updating it whenever there is a change.
- 15.6** It is the responsibility of the Investor Relations Officer to widely publicize this Trading Policy, so that all those subject to it are aware of the rules and obligations set out herein.

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*This is a free translation of Trading Securities Policy issued by Brisanet Serviços de Telecomunicações S.A*

## **Annex I – Draft Agreement to Adhere to the Trading Policy**

### **LETTER OF COMMITMENT TO THE POLICY FOR TRADING SECURITIES ISSUED BY BRISANET SERVIÇOS DE TELECOMUNICAÇÕES S.A.**

By the present document, **[insert name or corporate name]**, [insert qualification - nationality, marital status, profession, ID/RNE, if an individual; identify corporate type, if a legal entity], with address at [•], registered with the [CPF/MF / CNPJ/MF] under No. [•], as [indicate position held or "Controlling Shareholder"] of the [company controlled by] BRISANET SERVIÇOS DE TELECOMUNICAÇÕES S.A., a publicly-held company headquartered in the City of Pereiro, State of Ceará, at Highway CE-138, Pereiro CE border with RN, Km14, Carrossal Brisa Road 1Km, Gate A, Building 1, Entrance 2, 1º Floor, Room 1, Zip Code 63460-000, enrolled with the National Register of Legal Entities under CNPJ/ME No. 19.796.586/0001-70, hereinafter referred to simply as "Company", hereby declares that it is aware of the Company's Securities Trading Policy and undertakes to comply with the rules and procedures set out in this document and to conduct its actions in relation to the Company at all times in accordance with these provisions and the legal and regulatory provisions, including, without limitation, Law no. 6. 385, of December 7, 1976, as amended, Law No. 6404, of December 15, 1976, as amended, Securities and Exchange Commission Resolution No. 44, of August 23, 2022, and the Novo Mercado Listing Regulations of B3 S.A. - Brasil, Bolsão, Balcão.

[Place], [day] of [month] of [year]

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[NAME OR DESIGNATION]