

POLICY FOR TRADING SECURITIES ISSUED BY BRISANET PARTICIPAÇÕES S.A

1 PURPOSE

The purpose of this Securities Trading Policy is to establish rules to ensure the observance of good conduct practices in the trading of Securities issued by Brisamet Participações S.A., pursuant to CVM Instruction 358 of January 3, 2002, as amended.

2 DEFINITIONS

The terms and expressions listed below, when used in this Securities Trading Policy and spelled with initial capital letters, 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.

“General Meeting”: any ordinary or extraordinary general meeting of the Company.

“Relevant Act or Fact”: any decision of a Controlling Shareholder, resolution of the General Meeting or of the Company's Officers, or any other act or fact of a political-administrative, technical, business or economic-financial nature that has occurred or is related to its business, which may significantly influence (i) in the quotation of the Securities, (ii) the decision of investors to buy, sell or hold such Securities, and (iii) the decision of investors to exercise any rights inherent to the condition of holder of Securities.

“Stock Exchanges”: B3 S.A. - Brasil, Bolsa, Balcão, as well as any other stock exchanges or organized over-the-counter markets where the Company has securities admitted for trading, in Brazil or abroad.

“Company”: Brisamet Participações S.A.

“Fiscal Council Members”: the members of the Company's Fiscal Council, if one is in place.

“Board of Directors”: the Company's Board of Directors.

“Fiscal Council”: the Company's Fiscal Council, if installed.

“CVM”: the Securities and Exchange Commission.

“Investor Relations Officer”: the Company Officer responsible for providing information to the investing public, the CVM and the Market Entities, as well as for updating the Company's publicly-held company registration with the CVM and for executing and monitoring this Policy.

“Executive Board”: the Company's Executive Board.

“Market Entities”: all stock exchanges or organized over-the-counter market entities on which the Securities issued by the Company are or will be listed for trading, as well as equivalent entities in other countries.

“Former Administration”: the Administration who no longer take part in the Company's management.

“Employees with Access to Material Information”: the employees of the Company who, as a result of their office, function or position in the Company, have access to any Material Information.

“Material Information”: 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.

“CVM Instruction 358”: Securities Commission Instruction 358, of January 3, 2002, as amended.

“Brazilian Corporation Law”: Law n° 6.404 of December 15, 1976, as amended.

“Relevant Negotiation”: the business or set of businesses by means of which the direct or indirect participation of the Controlling Shareholder, the Administration, the Audit Board Members, and the members of any of the Company's bodies with technical or advisory functions, created by statutory provision, and of those who will acquire this quality, exceeds, upwards or downwards, the thresholds of 5% (five percent), 10% (ten percent), 15% (fifteen percent), and so on, of any Security representing the Company's capital stock.

“Lock-up Period”: any and all periods in which there is impediment to trading Securities by regulatory determination or the Investor Relations Officer.

“Policy”: this Policy for Trading Securities issued by Brisamet Participações S.A.

“Controlled Companies”: the companies in which the Company, directly or through other companies, is the holder of partner or shareholder rights that assure it, on a permanent basis, preponderance in the corporate resolutions and the power to elect the majority of the administration.

“Letter of Commitment”: letter of commitment to this Policy, to be signed in accordance with the model in **Annex I** of this Policy.

“Securities”: 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 POLICY FOR TRADING THE COMPANY'S SECURITIES

3.1 Lock-up Periods

3.1.1 The Company, the Administration, the Fiscal Council Members, the Employees with Access to Material Information, the Controlling Shareholder, the Controlled Companies and the persons who, by virtue of their post, function or position in the Controlling Shareholder or in the Controlled Companies, may have knowledge of Material Information about the Company and who have signed the Letter of Commitment, may not trade Securities during the Lock-up Period.

3.1.2 The Investor Relations Officer is not obliged to inform the reasons for the determination of the Lock-up Period, and the above-mentioned persons shall keep this determination confidential.

3.2 Restrictions on Trading Pending Disclosure of Relevant Act or Fact

3.2.1 The trading of Securities is forbidden (i) by the Company, (ii) by the Controlling Shareholder, the Administration, Fiscal Council Members, Employees with Access to Material Information or, further, members of any Company bodies with technical or advisory functions, created by statutory provision, and, further, (iii) by any person who, by virtue of his/her post, function or position in the Controlling Shareholder or the Controlled Companies and who has signed the Letter of Commitment, may have knowledge of Material Information about the Company, until the Company discloses it to the market in the form of Relevant Act or Fact. This rule also applies when:

- (i) acquisition or disposal of Securities by the Company itself, its Controlled Companies or other company under common control is in progress; or
- (ii) there is no intention to promote a takeover, incorporation of shares, total or partial spin-off, merger, transformation or corporate reorganization of the Company.

3.3 Exceptions to General Restrictions on Securities Trading

3.3.1 The restrictions on trading provided for herein do not apply to the Company itself, to the Controlling Shareholder, to the Administration, to the Fiscal Council Members, to Employees with Access to Material Information, to members of any Company bodies with technical or advisory functions, created by statutory provision, or to employees of the Companies Controlled by the Company that may have knowledge of Material Information, when carrying out transactions within the scope of this Policy.

3.3.2 The trades of the above-mentioned people made in accordance with a long-term investment plan approved by the Company, meeting at least one of these characteristics, will be included in the scope of this Policy, as follows:

- (i) acquisition of stocks under the share buyback program for cancellation or holding in treasury, by the Company;
- (ii) allocation of the variable remuneration, received as profit sharing of the Company or its Controlled Companies, in the acquisition of Securities; or
- (iii) acquisition of shares for cancellation or maintenance in treasury or disposal of treasury shares by the Company, by means of private trading, resulting from the exercise of the purchase option under the Company's stock option plan, duly approved by the General Meeting.

3.4 Restrictions on Trading after the Disclosure of Relevant Act or Fact

3.4.1 In the cases provided for above, even after disclosure of the Relevant Act or Fact, the prohibition on trading shall continue to prevail if it may interfere in trading conditions with Securities, in such a way as to cause damage to the Company itself or to its shareholders, and such additional restriction shall be informed by the Investor Relations Officer.

3.5 Prohibition to Trading in a Period Prior to the Disclosure of Quarterly Information and Standardized Financial Statements

3.5.1 The Company, the Administration, the Controlling Shareholder, the Fiscal Council Members, the Employees with Access to Material Information, and also the persons who by virtue of their office, function or position in the Controlling Shareholder or the Controlled Companies may have knowledge of Material Information about the Company and who have signed the Letter of Commitment, may not trade Securities during the fifteen (15)

days prior to the disclosure or publication (including the day of disclosure or publication), as the case may be, of the:

- (i) the Company's quarterly financial information (ITR); and
- (ii) the Company's standardized financial statements (DFP).

3.5.2 The restrictions set forth in item 3.5.1 above do not apply in the event of an individual investment program that meets the requirements set forth in article 15A, paragraphs 1 and 2 of CVM Instruction 358, whereby the persons subject to this Policy indicate, in an approximate manner, the volume of funds to be invested or the quantity of securities issued by the Company to be traded and the duration of the investment, which cannot be less than 6 (six) months.

3.6 Prohibition to Deliberation Related to the Acquisition or Disposal of Shares Issued by the Company Itself

3.6.1 The General Meeting or the Board of Directors may not approve the acquisition or disposal by the Company of securities of its own issuance until information has been disclosed to the public, if applicable, through the publication of Material Fact, concerning:

- (i) the execution of any agreement or contract for the transfer of the Company's share control;
- (ii) the granting of an option or mandate for the purpose of transferring the Company's share control; or
- (iii) any intention to promote takeover, incorporation of shares, total or partial spin-off, merger, transformation or corporate reorganization involving the Company.

3.6.2 If, after approval of the repurchase program, any fact that falls under any of the three hypotheses above occurs, the Company will immediately suspend operations with Securities issued by itself until the disclosure of the respective Relevant Fact.

3.7 Prohibition to Negotiate Applicable to Former Administration

3.7.1 Former Administration who leave the Company's management prior to the public disclosure of a Relevant Act or Fact concerning a business or fact started during their management period may not trade Securities for a period of six (6) months after their departure or until such Relevant Act or Fact has been disclosed, whichever occurs last, subject also to the provisions of item 3.7.2 below.

3.7.2 If trading in the Securities, even after disclosure of the Relevant Fact, may interfere in the conditions of such business, to the detriment of the Company or its shareholders, the former Administration may not trade Securities for a minimum period of six (6) months after their dismissal.

3.8 Additional Prohibitions

3.8.1 The prohibitions set forth in this Policy also apply to trades carried out directly or indirectly by the Administration, the Controlling Shareholder, Fiscal Council Members, Employees with Access to Material Information, and also by any person who, by virtue of his or her office, function or position in the Controlling Shareholder or Controlled Companies, has or may have knowledge of Material Information about the Company and who has signed the Letter of Commitment, including in cases where these trades are carried out through:

- (i) any company controlled by them;
- (ii) loan operations of securities issued by the Company;
- (iii) third parties with whom they have entered into a securities portfolio management or fiduciary business agreement (*trust*); or
- (iv) any person who has become aware of Material Information, through any of the persons prevented from trading, knowing that it has not yet been disclosed to the market.

3.8.2 The trades carried out by investment funds and/or clubs of which the persons mentioned in item 3.8.1 above are shareholders are not considered indirect trades and will not be subject to the prohibition set forth in this Policy, provided that:

- (i) the funds and/or investment clubs are not exclusive; and
- (ii) the trading decisions of the fund manager and/or investment club cannot be influenced in any way by their respective shareholders.

4 AMENDMENTS TO THE SECURITIES TRADING POLICY

4.1 Upon deliberation by the Board of Directors, this 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 modification in the applicable legal and regulatory norms, in order to implement the necessary adaptations; or
- (iii) when the Board of Directors, in the process of evaluating the effectiveness of the procedures adopted, finds the need for changes.

4.1.1 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.

4.2 The change of this Policy must be communicated to CVM and the Market Entities by the Investor Relations Officer in the manner required by the applicable rules, as well as to the persons included in the list referred to in item 6.1.3 below.

4.3 This Policy may not be changed in case of pending Relevant Fact not yet disclosed.

5 INFRACTIONS AND SANCTIONS

5.1 The Board of Directors shall be responsible for taking the appropriate disciplinary measures within the Company's internal scope, including removal from office or dismissal of the violator in cases of serious violation, without prejudice to the applicable sanctions under the terms of the regulations and legislation in force, to be applied by the competent authorities, in the event of violation of the terms and procedures established in this Policy.

5.2 Should the applicable measure fall under the legal or statutory competence of the General Meeting, the Board of Directors must convene it to deliberate on the matter.

6 GENERAL PROVISIONS

- 6.1** The Company shall send, by registered mail, e-mail or letter delivered by hand with protocol, to the Controlling Shareholder, officers and members of the Board of Directors, a copy of this Policy, requesting the return to the Company of the Letter of Commitment duly signed in accordance with **Annex I** of this Policy, which will be filed at the Company's headquarters.
- 6.1.1** When signing the term of office of the new Administration, they must be required to sign the term in **Annex I**, and be made aware of this Policy.
- 6.1.2** The communication of this Policy, as well as the requirement to sign the term contained in **Annex I**, to persons not referred to in item 6.1 above, shall be made before the person conducts any trading with Securities issued by the Company.
- 6.1.3** The Company shall keep at its headquarters, at the disposal of CVM, the list of persons referred to in item 6.1 and their respective qualifications, indicating position or function, address and enrollment number with the Brazilian Registry of Legal Entities or Individual Taxpayers, both of the Ministry of Economy, updating it immediately whenever there is any change.
- 6.1.4** The Controlling Shareholder, Administration, Fiscal Council members and members of any Company bodies with technical or advisory functions, created by statutory provision, and those who may acquire this quality, must not only sign the Letter of Commitment accordance with **Annex I**, but also sign the Declaration whose model is in **Annex II** in the case of Relevant Trading, and forward them to the Investor Relations Officer.
- 6.1.5** It is incumbent upon the Investor Relations Officer to widely disclose this Policy so that all those subject to it are aware of the rules and obligations set forth herein.
- 6.2** This Policy shall be complied with as from the date of its approval by the Board of Directors.

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ANNEX I

LETTER OF COMMITMENT TO THE POLICY FOR TRADING SECURITIES ISSUED BY BRISANET PARTICIPAÇÕES S.A.

By the present document, [insert name or corporate name], [insert qualification - nationality, marital status, occupation, RG/RNE, if an individual; identify corporate type, if a legal entity], with address in [-], enrolled with the [CPF/MF / CNPJ/MF] under No. [-], as [indicate position held or "Controlling Shareholder"] of the [company controlled by] **Brisanet Participações S.A.**, a publicly-held company headquartered in the City of Pereiro, State of Ceará, at Rodovia CE-138, Trecho Pereiro CE Divisa com RN, Km14, Estrada Carrossal Brisa 1Km, Portão A, Prédio 1, Entrada 2, 1º Andar, Sala 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 states that it has taken cognizance of the Company's Securities Trading Policy approved at the meeting of the board of directors held on [●], [●] 2021, pursuant to Instruction 358 of the Securities and Exchange Commission of Brazil (CVM) dated January 3, 2002, as amended, and commits to abide by the rules and procedures set forth in said document and to guide all actions related to the Company always in compliance with such provisions.

[insert place and date of signature]

[NAME OR DESIGNATION]

ANNEX II

I, **[name]**, [position or function], DECLARE that I [acquired/sold] [quantity] [shares, subscription warrants or debentures convertible into shares], having changed my interest in the Company's capital stock to [●]%, as described below:

- (i) objective of my participation: [●]%;
- (ii) number of shares, call options or subscriptions, held directly or indirectly: [●]%;
- (iii) amount of debt convertible into Company shares, held directly or indirectly, equivalent to: [●]%;
and
- (iv) contract or agreement regulating or limiting the voting or circulation power of the above mentioned securities (state the inexistence of such agreement or contract, if applicable): [●]%.

[insert place and date of signature]

[name]