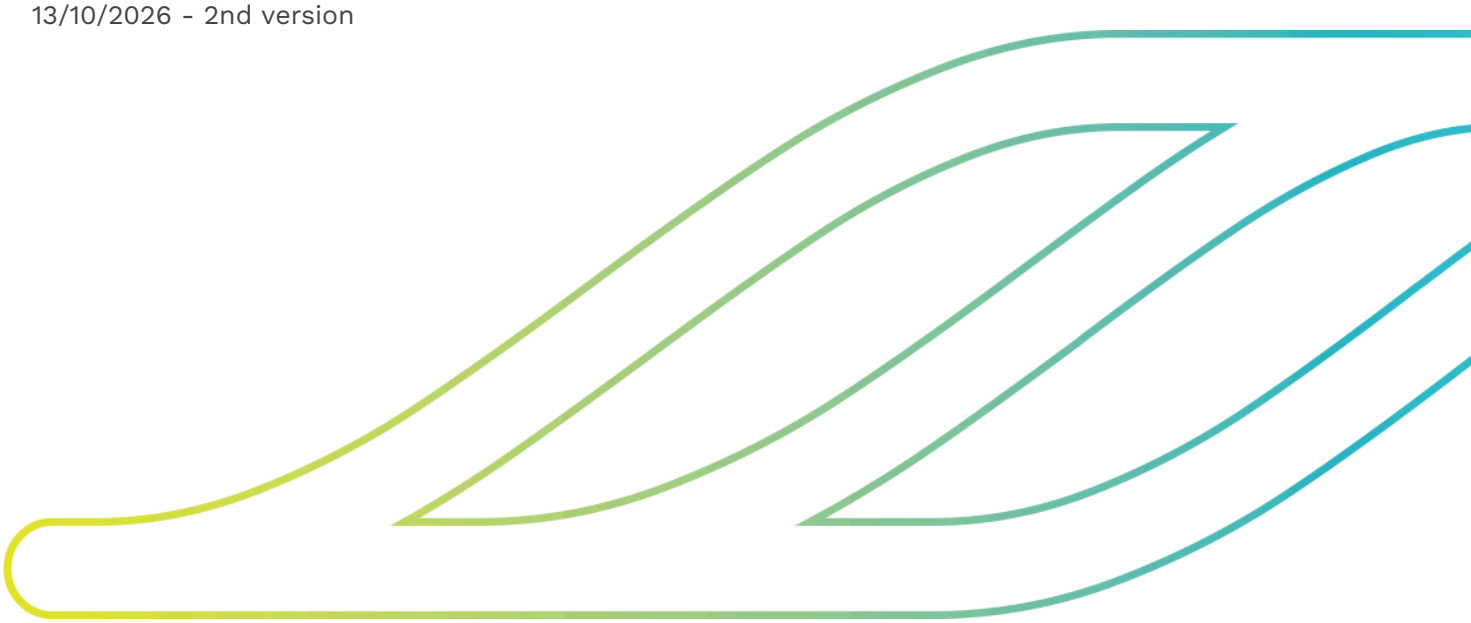
# Anti-Bribery Policy of Casa dos Ventos S.A. and other Participating Companies

**Code:**

CDVSA-029

**Data:**

13/10/2026 - 2nd version



# Summary


**1. Objective** **3**
**2. Scope** **3**
**3. Responsibilities** **3**
**4. General Guidelines** **4**
**5. Anti-Bribery Provisions** **4**
5.1. Anti-bribery Objectives 4
5.2. Applicable Legislation 5
5.3. Anti-Bribery Compliance Function 5
5.4. Anti-Bribery Culture 5
5.5. Other Provisions 5
5.5.1. Facilitation Payment 5
5.5.2. Use of Intermediaries or Business Partners 5
5.5.3. Political Donation 6
5.5.4. Gifts and Hospitality 6
5.5.5. Preliminary Analysis in Employee Hiring 6
5.5.6. Hiring of Public Officials or Relatives of Public Officials 6
**6. Adjustments to be implemented in other Policies** **6**
6.1. Due Diligence Policy 6
6.2. Know Your Customer, Intermediary, Business Partner and M&A Policy 7
6.3. Investigation, Non-Retaliation and Disciplinary Measures Policy 8
**7. Whistleblowing Channel and Disciplinary Measures** **8**
**8. Final Provisions** **8**
**9. Approvals** **9**
**10. Version Control** **9**

# 1. Purpose

This Policy defines the guidelines and procedures for the prevention of corruption, bribery, and other violations provided in applicable legislation, following the premises and management model established according to ISO 37001. These standards must be strictly followed by all those involved in the activities of Casa dos Ventos S.A. ("Casa dos Ventos" or "Organization"), directly or indirectly, as well as by all organizations that are or may become affiliated ("Participating Companies") within its Anti-Bribery Management System (ABMS).

In the event of omission or conflict between this Policy and current legislation, the applicable law in Brazil and/or in the countries with jurisdiction over the Participating Companies shall prevail.

It is essential that the interpretation of this Policy be carried out in conjunction with the Casa dos Ventos Code of Ethical Conduct, the Anti-Corruption Policy, the Anti-Bribery Management System Manual, and applicable legislation (such as Brazilian Law 12.846/13, the FCPA, the UKBA, and the Loi Sapin II), as well as any other relevant internal regulations.

# 2. Scope

This Policy covers all business units of Casa dos Ventos and Participating Companies. Its guidelines also extend to any person acting on behalf of any of the organizations, even temporarily, on a transitional basis, or as service providers, who are collectively referred to as "Employees" for the purposes of this document.

# 3. Responsibilities

| | |
|---|---|
| **Employees** | I. Attend training sessions on the Code of Ethical Conduct, this Policy, and the Anti-Bribery Management System (ABMS), among others designated by the Participating Companies;<br>II. Encourage and assist in the dissemination of Integrity and Ethics standards;<br>III. Collaborate with internal and external investigations, when requested, following the guidance of the Integrity and Ethics area and the Ethics Committee;<br>IV. Report any conduct that has or may have violated the organization's current rules and policies through the Ethics Channel provided by the organization;<br>V. Immediately halt and prevent any actions that do not comply with the laws and/or internal regulations of the Participating Companies. |
| **Leadership of Participating Companies** | I. Lead the implementation of the Anti-Bribery Management System (ABMS), ensuring the participation of all individuals according to their activities within the participating companies;<br>II. Maintain a reporting channel and adequate means for investigating reports, ensuring the independence of investigations, confidentiality, and non-retaliation against whistleblowers acting in good faith;<br>III. Ensure that the anti-bribery system receives the resources and structure necessary for effective operation. |
| **Integrity and Ethics** | I. In the role of anti-bribery compliance, ensure adherence to legal requirements, the Code of Ethical Conduct, and this Policy, as well as all other Policies and Procedures applicable to Participating Companies; |

| | |
|---|---|
| | II. Propose the necessary actions to implement and improve the anti-bribery management system, as well as training on the Anti-corruption and anti-bribery at the Participating Companies;<br>III. Receive reports from the Ethics Channel of Participating Companies and prepare the respective reports for the Ethics Committee and Senior Leadership. |

# 4. General Guidelines

The organization commits to fully comply with the requirements of its Anti-Bribery Management System (ABMS). Furthermore, it commits to pursuing continuous improvement of this structure, ensuring the updating and effectiveness of controls, training, regulations, routines, and monitoring mechanisms to promptly respond to regulatory changes, legislative changes, and other challenges that may arise. Any necessary revisions will be detailed in a specific annex or dedicated action plan.

# 5. Anti-bribery provisions

In accordance with the guidelines of the Code of Ethical Conduct and the Anti-Corruption Policy of Casa dos Ventos, any conduct involving offering, promising, soliciting, or receiving, directly or indirectly, undue advantage of any value, financial or otherwise, whether for personal benefit, for benefit of Casa dos Ventos, or its Participating Companies, with the intention of influencing a decision or obtaining or retaining a commercial advantage, is expressly prohibited and illegal.

Bribery can take many forms. Therefore, it is important to clarify that:

a. It can be active (offering or promising) or passive (requesting, agreeing to receive, or accepting);
b. It can occur anywhere and involve anyone (national or foreign public officials, or even employees of private institutions);
c. Something of value should be understood broadly, and may include, but is not limited to, the following transactions: money and money equivalents, such as gift cards, debit cards, cryptocurrencies, stablecoins; high-value meals and drinks; entertainment; accommodation; travel and travel-related expenses; training and education services; job offers or referrals; discounts on products and services; loans; charitable donations; sponsorships; rewards as part of contests, raffles, games of chance, or in exchange for opinions; use of materials or facilities; forgiveness or cancellation of debts; any transfer of value, even if nominal.

It is important to understand that corruption refers to any form of abuse of power for private gain, and includes, but is not limited to, bribery. Corruption is also strictly prohibited, as detailed in the CDVSA-003 Policy on the Prevention of Corruption, Fraud and Money Laundering of Casa dos Ventos S.A.

In summary, it is strictly forbidden to offer a bribe — regardless of whether it is accepted — as well as to assist, encourage, demand, or coordinate with third parties, whether public or private, the practice of bribery, whether directly or indirectly.

## 5.1. Anti-bribery objectives

In order to mitigate risks related to corruption and bribery, Casa dos Ventos establishes the system targets and a corresponding action plan. As indicated in the Objectives Mapping, this planning includes defining actions, designating those responsible, specifying the necessary resources, setting deadlines, and monitoring through indicators.

## 5.2. Applicable Legislation

Casa dos Ventos and its participating companies are subject to the Brazilian Anti-Corruption Law (Law No. 12,846/13). Furthermore, the organization maintains relationships with foreign entities, which may subject their activities to the legislation of foreign jurisdictions in which those entities are established or operate in the securities market. Therefore, in summary, for the conceptualization and assessment of bribery risk, the following foreign regulations will be taken into consideration:

I. United States: Foreign Corrupt Practices Act (FCPA)
II. United Kingdom: UK Bribery Act (UKBA)
III. French: Loi Sapin II

## 5.3. Anti-bribery Compliance Function

The management of the Anti-Bribery System is the responsibility of the Integrity and Ethics Director, who acts with autonomy and technical expertise to supervise, monitor, and report to Senior Management on the implementation of the system, as well as any bribery risks that may be identified. This role has the independence to conduct investigations, suggest corrective actions, and strengthen the practice of ethical conduct within the organization.

## 5.4. Anti-bribery culture

Senior Management reaffirms its commitment to consolidating an anti-bribery culture, disseminating the ethical standard to be followed by all employees, without exception. To this end, Casa dos Ventos develops and implements an annual Communication and Training Plan, encompassing initiatives such as training sessions, awareness campaigns, compliance weeks, and the distribution of educational materials that convey the necessary messages.

Furthermore, considering that the organization has five fundamental pillars widely publicized by the Human Resources area and Senior Leadership, the pillar called Conscious Discipline, which consists of doing the right thing because it is right, acts as a cornerstone for structuring the anti-bribery system. In this way, the culture of prevention gains the necessary support and is driven by the actions of these areas.

## 5.5. Other Provisions

### 5.5.1. Facilitation Payment

It is strictly prohibited to make any type of facilitation payment. Facilitation payments are defined as small amounts, items of value, or favors granted to public officials or third parties with the intention of expedite or secure the execution of administrative routines, normal procedures, or ordinary and non-discretionary governmental actions to which the organization already has a legal right. Our employees and partners must not make such payments under any circumstances or justification.

### 5.5.2. Use of Intermediaries or Business Partners

The hiring and use of intermediaries such as agents, consultants, or business partners on behalf of the organization must occur under rigorous prior due diligence evaluation by the Integrity area. The use of any interposed person, whether physical or legal, for the purpose of circumventing or violating established ethical standards and anti-bribery policies is expressly prohibited. Furthermore, all employees involved in hiring these partners are responsible for ensuring that they all expressly agree to comply with Casa dos Ventos' integrity guidelines through specific contractual clauses.

### 5.5.3. Political Donation

According to CDVSA-012, the Donations, Sponsorships and Social Investments Policy, it is forbidden to make contributions or donations of any kind, directly or indirectly, to political parties, coalitions, candidates for public office or election campaigns, using resources, assets, image or facilities of the organization or in the name of Casa dos Ventos. This prohibition aims to ensure total partisan neutrality and the independence of the organization's institutional and operational activities.

### 5.5.4. Gifts and Hospitality

The offering or receiving of items of nominal value or hospitality must comply with value limits, registration requirements, and approval rules, as defined in CDVSA-007 Gifts and Hospitality Policy. Offering gifts and entertainment is strictly prohibited. Accepting or granting any benefit or courtesy is prohibited when there is an explicit or implicit intention to influence business decisions, obtain undue advantages, or in situations that may generate a conflict of interest.

### 5.5.5. Preliminary Analysis in Employee Hiring

The Human Resources department is responsible for conducting due diligence on candidates. This procedure is applied to positions exposed to a higher than low risk of bribery, which, according to the current risk matrix, includes the company's directors and legal representatives, as they are the ones with the authority to approve contracts and/or payments.

### 5.5.6. Hiring of Public Officials or Relatives of Public Officials

The recruitment of current public agents (prohibited, except for teaching positions) or former agents requires compliance with CDVSA-005 Conflict of Interest Policy, which, in accordance with applicable legislation, provides for compliance with a quarantine period, a prevention clause in the contract, and deliberation by the originating body. The hiring of individuals with family or close relationships with public agents (or former agents for up to 5 years) is permitted, provided it does not constitute a clear conflict of interest, and must be declared in the Conflict of Interest Questionnaire (COI). The selection process must follow technical criteria of merit, transparency, and equality. The case will be evaluated by the Ethics Committee and the Presidency, with the Human Resources area and the Management responsible for defining the final contractual mitigations against conflicts of interest, influence peddling, or undue advantages. It should also be noted that the public official or a person with whom they have a close personal, family, or business relationship may not act on behalf of Casa dos Ventos in the public entity from which the public official originated.

## 6. Whistleblowing Channel and Disciplinary Measures

Casa dos Ventos encourages employees to raise concerns in good faith or based on a reasonable belief regarding any facts or suspicions of bribery through the Ethics Channel, without fear of reprisal or retaliation.

To ensure the system's security, the organization provides a third-party platform where reports are made confidentially and with guaranteed anonymity. Any retaliation or punishment against whistleblowers acting in good faith is strictly prohibited. To guide and protect whistleblowers, the organization also establishes the CDVSA-010 Internal Investigation, Non-Retaliation and Disciplinary Measures Policy.

Failure to comply with this Policy may result in disciplinary action, as well as the application of other measures provided for in applicable legislation.

Any violation of the provisions of this Policy must be immediately reported to the Ethics Channel via the website.www.contatoseguro.com.br/casadosventos, by phone at 0800 800 8084 or via WhatsAppWhatsApp: +55 (51) 3376-9353, all available 24 hours a day, 7 days a week. In addition, you can speak directly to the Ethics Committee atcomitedeetica@casadosventos.com.br.

All communications with the Integrity and Ethics area are strictly confidential, and additional information, such as training materials, brochures, and guides, are available on the intranet and in the Integrity and Ethics management tool.

# 7. Final Provisions

This Policy shall be adopted immediately upon its approval by the Board of Directors of Casa dos Ventos and the other Participating Companies.

Any violation of the provisions of this Policy, as well as any internal Policy relevant to SGAS, must be reported to the Ethics Channel.

# 8. Approvals

MR. MÁRIO ARAÚJO ALENCAR ARARIPE

HOUSE OF WINDS S.A.

OTHER PARTICIPATING COMPANIES

# 9. Version Control

The policies of Casa dos Ventos should be reviewed every 2 (two) years, or whenever necessary. Non-material changes will not, however, require a new collection of acceptance from employees.

| Version | Data | Description | Responsible |
|---|---|---|---|
| First Version | 08/31/2026 | Initial document | Integrity and Ethics |
| First Version | 09/25/2026 | Document approval | Ethics Committee |
| Version 2 | 10/13/2026 | Review following first-party audit | Integrity and Ethics |
| Version 2 | 10/14/2026 | Document approval | Ethics Committee |
| Version 2 | 10/16/2026 | Translation with the support of IA | Integrity and Ethics |