



*Money Laundering
Prevention Policy*

OCTOBER 2025

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A. INTRODUCTION AND OBJECTIVE

The Policy for Combating and Preventing Money Laundering, Financing of Terrorism, and Financing of the Proliferation of Weapons of Mass Destruction ("Money Laundering Prevention Policy", "AML-CFT" or "AML Policy") disciplines and provides guidelines on the attributions, responsibilities, and procedures adopted by (i) Perfin Infra Administração de Recursos Ltda. ("Perfin Infra"); (ii) Perfin Equities Administração de Recursos Ltda. ("Perfin Equities"); and (iii) Perfin Wealth Management Ltda. ("Perfin Wealth Management" or "PWM"), which together make up the entities of Perfin ("Perfin", "Managers" or "Company"), in compliance with legal and regulatory obligations to prevent and combat money laundering, financing of terrorism, and the proliferation of weapons of mass destruction in the course of developing their business. This Policy was approved and instituted by the Strategic Council of Perfin.

According to Law no 9.613/1998, money laundering is the process by which the true origin and ownership of resources derived from illegal activities are concealed. When successful, it allows interested parties to retain control over these resources and ultimately give the appearance that their source is legitimate.

The specialized literature breaks down the washing process into three distinct stages, which are often complex and may develop over a period of time or even occur simultaneously.

Placement of money: it is the initial stage, because money is still close to its origins; it is characterized by the introduction of illegally obtained resources into the financial system;

Concealment or camouflage: is the stage in which the criminal seeks to break the chain of evidence before the possibility of investigations on the origin of the resources moved; and,

Integration: is the stage where it becomes nearly impossible to distinguish between legal and illegal wealth; illicit money is re-entered into the economic-financial system, blending with other assets.

Terrorism is defined in Law no 13.260/2016 and refers to the act by one or more individuals of using, transporting, or carrying harmful substances or materials capable of causing mass destruction, cyber threats, or threats to life and physical safety. These acts are committed based on xenophobia, discrimination, or prejudice against race, color, ethnicity, or religion, and are intended to provoke social or widespread terror, endanger persons, property, public peace, or safety.



The procedures for combating and preventing money laundering, terrorism financing, and the proliferation of weapons of mass destruction are led by the Director of Internal Controls and Compliance ("DoC") of Perfin, with involvement from the operational and registration areas.

The AML-CFTP legislation mandates, in addition to criminalizing money laundering and terrorism, the sectors that must follow specific internal controls, which will be detailed throughout this document.

B. APPLICABILITY

The rules provided for in this Policy shall be applied to all partners, directors, officers, employees, trainees, consultants, as well as invested companies owned by investment funds managed by Perfin, as well as any person acting on behalf of the Company ("Employees").

For the purposes of the activities carried out by Perfin, the greatest risks of involvement with money laundering practices, financing terrorism, and financing the proliferation of weapons of mass destruction occur when receiving funds from investors of the managed funds (liability) and when applying the resources under management to assets that will be held by the managed funds (asset).

The procedures described in the following topics aim to reduce the risks of involving Managers, managed funds, and portfolios in illegal practices outlined in the legislation, whether involuntary or not.

C. REGISTRATION AND OPENING OF ACCOUNTS

Clients must be properly registered before receiving funds and making any investments through Perfin. If employees responsible for internal processes suspect any data or information provided by the customer—such as inconsistencies in income, address, professional activity, resistance to submitting personal information, or for other reasons—they should report the situation to the DoC. This allows for an evaluation of the necessary actions and helps decide whether to accept or reject the client.

If the client unjustifiably resists or refuses to provide information required by law or regulation, Perfin may immediately sever the connection with the investor. Documentary requirements may differ depending on the type of relationship and the investor's risk profile.

If any customer-provided information is incomplete or inconsistent with publicly obtained information by Managers, Compliance shall identify the inconsistencies and recommend measures to address them.

If such inconsistencies cannot be resolved or if there are restrictions or concerns about the commission of crimes, the client should be rejected or must go through the exceptional approval process by the Compliance Committee, including reporting any related transactions to the appropriate authorities.

If the KYC process is interrupted under these circumstances, Compliance must be notified and will be responsible for determining whether there is a need to report suspicious activity to regulatory authorities, including the Financial Activities Control Board ("COAF").

In addition, employees may not accept transactions or engage in any business or activity with customers who are unable to attest to the origin of the resources they plan to deliver to management Perfin.

C.1. MANAGED PORTFOLIOS AND EXCLUSIVE FUNDS

In accordance with CVM Resolution 50/21 guidelines, although the Managers exercise discretionary management of assets without client influence on their investment choices, if the Managers manage individual portfolios or exclusive funds, these will be classified as high-risk customers according to the customer identification policy ("Know Your Client" - "KYC") as outlined below.

In this context, shareholders of exclusive funds and clients of managed portfolios must undergo an initial due diligence process for KYC purposes before their acceptance, as well as their transactions will be periodically monitored by Compliance.

The Managers will seek information about the origin of the resources to be invested in the Managers and their compatibility with the assets declared by the client in his registration, under the terms of CVM Resolution 50/21.

D. GOVERNANCE RULES

As detailed below, one of the controls adopted within the scope of this Policy is for the Operations area to evaluate the compatibility of transactions made by clients with their investor profile, as defined through the suitability procedures outlined in Perfin's Distribution and Registration Manual. If there is any discrepancy in the movements made by the customers, the DoC should be notified immediately.

The DoC may, at its sole discretion, convene a Compliance Committee meeting to address any evidence of money laundering, terrorism financing, proliferation of weapons of mass destruction, and to evaluate reports on such activities to authorities.

In addition to the verification by the Operations area on the compatibility of investments with the client’s profile, the risk-based approach, as described above, will be carried out by the DoC, involving the operational and registration areas. If necessary, any re-evaluation of risk may be discussed by the Compliance Committee.

Based on the Managers' business, which involves managing investment funds and distributing the quotas of these funds, there will be two initiatives for AML-CFT.

- i. In relation to the assets, any transactions made outside market prices without plausible justification shall be identified, as well as transactions with unqualified counterparties or for which complete registration information cannot be obtained.
- ii. In relation to the clients, when Perfin acts as a distributor of fund quotas under management, any client movements that seem suspicious must be identified. This includes actions lacking a proper, plausible economic justification or that are inconsistent with the declared patrimonial situation or the origin of resources in the register.

E. RISK-BASED APPROACH

Perfin has created this risk-based approach to make sure that the prevention and mitigation measures in this Policy are proportionate to the identified risks.

Below, we list the services provided by Perfin, along with the products offered and distribution channels, including their respective risk levels, in accordance with the provisions of article 5 of CVM Resolution 50/21.

Products Offered	Level of Risk	Services Provided	Level of Risk	Distribution channels and trading and registration environments	Level of Risk
Investment Funds	Low	Management of third-party resources and distribution of funds under management	Low	-Own Distribution -Investment Platform -Autonomous Agent -External Distributors	Low

Portfolio Management	Low	Management of third-party resources	Low	-Own Distribution -Investment Platform -Autonomous Agent -External Distributors	Low
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In addition, still in compliance with article 5 of CVM Resolution 50/21, we classify Perfin's customers, potential or existing:

Clients	Level of Risk
Managed portfolios and exclusive funds	High
Customers from the border region or in places known to be at risk	High
Clients who are residents, established or domiciled, or who use in their relationship with the funds bank accounts held in countries that do not apply or insufficiently apply the recommendations of the Financial Action Group against Money Laundering and Financing of Terrorism - FATF	High
Customers with frequent occurrences of deviations from the established operational normal situation, without due justification	High
Notes from the list called Specially Designated Nationals ("SDN List"), published by OFAC - Office of Foreign Assets Control (Office of Foreign Assets Control) of the United States Treasury Department, as mentioned in the Registration and Know Your Client Policy - KYC	High
Clients who present notes in the due diligence process relevant from the perspective of money laundering	High
Clients distributed by account and order without relevant notes under the AML-CFTP perspective	Low
Investment funds without relevant notes under the AML-CFTP perspective	Low
Closed Supplementary Pension Entities without relevant notes under the AML-CFTP perspective	Low

Other customers whose distributors responsible for AML-CFTP checks are financial institutions accepted by Perfin in which there is no relevant information under the AML-CFTP perspective	Low
Other customers not listed above	The risk classification must be ratified by the DoC

Perfin’s Distribution and Registration Manual enhances and clarifies the risk classification criteria for investors of managed funds.

F. AML-CFT PROCESSES ON CLIENTS (KNOW YOUR CLIENT – KYC)

Not identifying points of attention in the information collected during the KYC and customer registration process will result in automatic approval.

For clients classified as high risk under the above criteria, they must be approved by the Compliance Committee.

Compliance shall conduct periodic checks and monitoring throughout its relationship with customers, adjusting the frequency based on identified risk factors and the assigned risk classification to the investor. The monitoring will be continuous for the entire duration of the relationship, and the cadastral update should never exceed a period of 36 (thirty-six) months.

Disclosures to authorities, including the COAF, may be made due to factors such as the investor being on restriction or sanction lists.

F.1. ROUTINES RELATED TO CLIENTS

With respect to clients, the Managers will carry out the following routines and procedures:

- a. Clients who qualify as "distributed by order", "investment funds", "pension schemes", and other quota holders whose distributors responsible for AML verifications are exempt from AML analysis because they are institutions duly regulated by the Central Bank of Brazil ("BACEN") and/or Securities Commission ("CVM") that have previously been diligent and contractually bound to Perfin (low-risk clients);
- b. Must be analyzed by the Compliance Committee clients who:
 - i. Opened accounts with the power of attorney;

- ii. Opened accounts on behalf of companies;
- iii. Are identified as Politically Exposed Persons ("PEP"), under the terms of COAF resolution 40/2021 or persons related by degree of kinship or society with PEP ("PEP Related");
- iv. Maintain relationships with countries considered high risk (birth, residence, business, bank accounts and any other personal or business ties);
- v. Engage in personal or professional activities or occupations considered high-risk for money laundering purposes;
- vi. Present other risk factors considered material by the Compliance Committee; and
- vii. Are not tax residents in Brazil, pursuant to CVM Resolution 50/21.

F.2. MONITORING OF ATYPICAL SITUATIONS

The monitoring of operations and situations provided for in art. 20 of CVM Resolution 50/21 will be carried out, which are:

- a. situations where it is not possible to keep customer registration information up to date
- b. situations where it is not possible to identify the final beneficiary¹;

¹ “§ 1o For the purposes of this Resolution, the following persons are considered to be politically exposed:
I - the holders of elective mandates of the Executive and Legislative Powers of the Union;
II - the holders of office, in the Executive Branch of the Union, of:
a) Minister of State or equivalent;
b) Special Nature or equivalent;
c) Chairman, Vice-Chairman and Director, or equivalent, of indirect public administration entities; and
d) Management and Superior Advice - DAS level 6 or equivalent;
III - the members of the National Council of Justice, the Supreme Federal Court, the Superior Courts, the Regional Federal Courts, the Regional Labor Courts, the Regional Electoral Courts, the Superior Council of Labor Justice and the Federal Justice Council;
IV - the members of the National Council of the Public Prosecutor, the Attorney-General of the Republic, the Vice-Procurator-General of the Republic, the Attorney-General of Labor, the Attorney-General of Military Justice, the Assistant Attorneys-General of the Republic and the Prosecutors, Justice Generals of the States and Federal District;
V - the members of the Court of Auditors of the Union, the Attorney-General and the Deputy Attorneys-General of the Public Prosecutor’s Office to the Court of Auditors of the Union;
VI - the Presidents and National Treasurers, or equivalent, of political parties;
VII - the Governors and Secretaries of State and the Federal District, the State and District Deputies, the Presidents, or equivalent, of entities of the indirect public administration of states and districts and the Presidents of Courts of Justice, Military, Accounts or equivalent of State and Federal District;

- c. situations in which the procedures provided for in Section II of Chapter IV of CVM Resolution 50/21 cannot be completed;
- d. in the case of customers classified under item I of art. 1 of Annex B, of the CVM Resolution /21 50, operations whose values appear incompatible with the professional occupation, income or financial situation of any of the parties involved, based on the respective registration information;
- e. in the case of customers classified under paragraphs II to V of art. 1o of Annex B, of the CVM 50/21 Resolution, incompatibility of the economic activity, the social object or the billing informed with the operational standard presented by clients with the same profile;
- f. transactions carried out between the same parties or for the benefit of the same parties, in which there are subsequent gains or losses with respect to any of the parties involved;
- g. transactions that show significant variation in relation to the volume or frequency of business of any of the parties involved;
- h. operations whose unfolding includes features that may serve as a decoy to prevent the identification of the involved personnel and their beneficiaries;
- i. operations whose characteristics and developments demonstrate acting persistently on behalf of third parties;
- j. operations that show a sudden and objectively unjustified change in the operational modalities usually used by those involved;
- k. operations whose degree of complexity and risk appear incompatible with:
 - i. the profile of the customer or his representative, in accordance with the specific regulation that provides for the duty to verify the adequacy of products, services and operations to the profile of the customer; and
 - ii. with the client's size and social object.

VIII - the Mayors, the Councilors, the Municipal Secretaries, the Presidents, or equivalent, of entities of the indirect municipal public administration and the Presidents of Courts of Accounts of Municipalities or equivalent."Governadores e os Secretários de Estado e do Distrito Federal, os Deputados Estaduais e Distritais, os presidentes, ou equivalentes, de entidades da administração pública indireta estadual e distrital e os presidentes de Tribunais de Justiça, Tribunais Militares, Tribunais de Contas ou equivalentes dos Estados e do Distrito Federal; e VIII – os Prefeitos, os Vereadores, os Secretários Municipais, os presidentes, ou equivalentes, de entidades da administração pública indireta municipal e os Presidentes de Tribunais de Contas ou equivalentes dos Municípios.”

- l. operations carried out with the apparent purpose of generating loss or gain for which there is no objective economic or legal basis;
- m. private transfers of resources and securities without apparent motivation, such as:
 - i. between clients' current accounts with the intermediary;
 - ii. securities ownership without financial movement; and
 - iii. securities outside the organized market environment.
- n. deposits or transfers made by third parties, for the settlement of customer transactions, or to provide collateral in transactions in future settlement markets;
- o. payments to third parties, in any form, for the settlement of transactions or redemptions of amounts deposited as collateral, recorded on behalf of the client;
- p. transactions carried out outside the market price;
- q. assets achieved by sanctions imposed by the UNSC resolutions referred to in Law 13.810/2019;
- r. assets reached by request for a measure of unavailability from a foreign central authority that will be known;
- s. the conduct of business, whatever its value, by persons who have committed or attempted to commit terrorist acts, or participated in or facilitated their commission, as provided for in Law 13.260/2016;
- t. securities owned or controlled, directly or indirectly, by persons who have committed or attempted to commit terrorist acts, or participated in or facilitated their commission, as provided for in Law 13.260/2016;
- u. movement likely to be associated with the financing of terrorism, according to the provisions of Law 13.260/ 2016;
- v. operations with the participation of natural persons, legal entities or other entities that reside, have their headquarters or are incorporated in countries, jurisdictions, dependencies or locations:
 - i. that they do not apply or insufficiently apply the recommendations of the FATF, as listed by that body; and
 - ii. with favored taxation and subject to privileged tax regimes, according to rules issued by the Federal Revenue of Brazil;

F.3. SYSTEMS USED

AML-CFT research and risk assessment will be performed using commercially available research systems and technologies that leverage risk intelligence databases to identify individuals and entities for compliance with national regulations and relevant international standards for Know Your Customer (KYC), Money Laundering Prevention and Control (AML), and Terrorist Financing (CFT) obligations. Perfin will utilize specialized service providers to support the AML-CFT research process, applying its governance to the results obtained from these providers.

G. AML-CFT PROCESSES ON THE ASSETS

G.1. PROCESS FOR IDENTIFICATION OF COUNTERPARTIES

In transactions involving identifiable counterparties, the Managers may conduct due diligence on the partners responsible for transactions in organized markets, such as brokers and securities distributors. Besides initial due diligence, ongoing monitoring of brokers operating on behalf of the funds and portfolios managed by the Managers is performed. Compliance maintains a list of all counterparties authorized to operate for Perfin vehicles. Both Compliance and Operations are responsible for maintaining Perfin's list of authorized brokers.

G.2. OUTSOURCED DISTRIBUTION

In cases where the distribution of the funds' quotas is outsourced to Intermediary Institutions for a period of no more than 36 (thirty-six) months, Compliance shall conduct due diligence procedures with the Intermediary Institutions to verify the adequacy of their AML processes. This must be done in accordance with the procedures outlined in this Policy and in Perfin's Third-Party Purchasing and Contracting Policy, while also complying with CVM Resolution 50/21. These procedures include using the policy for customer registration and identification, identifying areas and processes susceptible to risk, providing appropriate training for employees, maintaining updated customer records, utilizing specific systems for investigating and detecting suspicious activities, and establishing high-level management bodies responsible for AML-CFTP initiatives. Additionally, the DoC must familiarize itself with the policies and manuals against money laundering adopted by administrators, distributors, and custodians of funds that are or will be managed by Managers.

Additionally, information exchange procedures may be established with distributors and trustees of managed funds to assess the opportunity and relevance of requesting more client information, based on internal risk assessments and other provisions of this Policy.

Perfin will depend on the efforts of administrators, distributors, and custodians of the funds it manages or will manage to (i) identify new or existing clients, including before investments are made; and (ii) prevent, detect, and report any suspicious transactions.

Even when the distribution of quotas is outsourced, if Managers gain access to the cadastral information of quotaholders, they may perform KYC procedures according to the Policy to ensure proper identification of customers and to reduce the risk of evidence of illegal activities related to money laundering, despite the responsibility of the external distributor.

G.3. MONITORING - PRICE CONTROL OF ASSETS AND SECURITIES TRADED

The Managers will establish a counterparty identification process appropriate to the characteristics and specificities of their businesses. It should be noted that the assets and securities listed below, depending on their counterparty and the market in which they are traded, have already passed through the AML-CFT process, thereby excluding the Managers from additional due diligence regarding the control of the counterparty, namely:

- a. Initial and secondary public securities offerings registered according to the rules issued by the CVM;
- b. Public offers with limited efforts, exempt from registration according to rules set by the CVM.
- c. Assets and securities admitted to trading on stock exchanges, commodities, and futures, or registered in registration, custody, or financial settlement systems, properly authorized in their countries of origin and supervised by recognized local authorities, except low-liquidity shares.
- d. Assets and securities whose counterparty is a financial institution or similar; and
- e. Assets and securities of the same economic nature as those listed above, when traded abroad, are acceptable if (a) they are admitted to trading on stock exchanges, commodities, and futures markets, or registered in a registration, custody, or financial settlement system, duly licensed in their home countries and supervised by a local authority recognized by the CVM, or (b) their existence has been secured by third parties authorized to carry out custody activities in countries that are signatories to the Treaty of Asunción or other jurisdictions, or supervised by a local authority recognized by the CVM, except for low-liquidity shares.

As an exception to the above provisions, and in accordance with the guidelines of CVM Resolution 50/21, the Managers will pay special attention to suspicious transactions that may be reported to the COAF in cases of trading on a stock exchange where possible, considering the specific circumstances of the trade, determine the counterparty of the trades, such as when trading low liquidity assets or when it is a transaction between investment funds managed by Perfin.

For securities subject to private distribution (fixed income or shares), credit rights, real estate developments, etc., the Managers will implement, in addition to the process of identifying counterparties, other procedures according to the guidelines of the Policy to ensure compliance with the minimum AML-CFT standards, or to verify that the counterparty has basic mechanisms for such analysis.

Perfin's strategies involving operations in the organized market, mainly the stock exchange, are outside the scope of AML-CFT processes in assets.

PWM funds and portfolios are required to carry out these processes primarily related to private credit assets. The credit analysis process also involves due diligence of the issuer and a documentary review of the asset, which helps identify risk indicators for AML-CFT purposes.

For assets acquired by infrastructure funds, different types of due diligence are conducted regarding the assets and the parties involved in the transaction. Perfin infra will use its internal resources and the support of specialized external consultants for due diligence on various aspects of the asset to be acquired, including reputational and integrity assessments, accounting, tax, and legal assessments, etc. Among other elements that can be identified and addressed, indications of irregularities such as corruption practices, money laundering, and fraud are evaluated. The results of the due diligence will allow Perfin to build a broad risk matrix and establish action plans to mitigate and eliminate these risks should the transaction evolve.

H. DETECTION OF SUSPICIOUS ACTIVITIES

Any suspicion of financial or non-financial activities that may involve money laundering, concealment of goods and assets, terrorism, proliferation of weapons of mass destruction, or illicit gains by managers, customers, or employees must be reported immediately to the DoC. Each case will be reviewed individually, and failure to perform the obligations and to report may result in disciplinary actions and legal consequences.

I. INTERNAL RISK ASSESSMENT REPORT

The DoC will prepare an annual report on the internal risk assessment of AML-CFT, which will be forwarded to the Compliance Committee and the Strategic Council in their capacity as organs of the senior management of the Managers by the last business day of April, containing the information required in sections I and II of art. 6o of Resolution CVM 50/21, namely:

- a. identification and analysis of risk situations of money laundering or financing of terrorism or proliferation of weapons of mass destruction, considering the respective threats, vulnerabilities and consequences;
- b. table relating to the previous year, containing:
 - i. the consolidated number of transactions and atypical situations detected, separated by each hypothesis;
 - ii. the number of analyses performed;
 - iii. the number of suspicious transaction reports reported to COAF; and
 - iv. the date of the negative statement report.
- c. the measures adopted to comply with the provisions of paragraphs "b" and "c" of paragraph II of art. 4 of Resolution CVM 50/21;
- d. Presentation of the effectiveness indicators, including the timeliness of detection, analysis, and communication of operations or atypical situations.
- e. presentation, where appropriate, of recommendations to mitigate the identified risks from the previous year that have not yet been properly addressed, including:
 - (a) potential changes to the guidelines outlined in the Policy;
- f. improvement of the rules, procedures, and internal controls referred to in art. 7o of CVM Resolution 50/21, including the establishment of sanitation schedules; and
- g. Indication of the effectiveness of the adopted recommendations referred to in the item above in relation to the respective previous report, according to the methodology discussed in paragraph II of article 4 of CVM Resolution 50/21, with results individually recorded.

J. COMMUNICATION TO COAF

The Managers shall notify the COAF within 24 (twenty-four) hours after completing the analysis that identified the atypicality of the operation, proposed or unusual situation.

They must refrain from disclosing this information to any person, including those to whom the information pertains. The notification should describe cases that may indicate serious evidence of crimes such as money laundering or concealment of property, rights, and assets derived from criminal activity, as outlined in Article 1 of Law 9.613/1998, including terrorism or its financing, or related matters. This applies in situations where (i) there are exceptional characteristics regarding the parties involved, the method of production, or the instruments used; or (ii) there is no clear economic or legal basis.

The records of the conclusions from its analysis of operations or proposals that supported the decision to communicate or not must be kept for a period of 5 (five) years, or longer if required by the CVM.

The Managers, provided that no communication of this item has been given to the COAF, must report to the CVM annually by the last working day of April, using the mechanisms established in the agreement between the CVM and the COAF.

The DoC will handle the communications described in this item, with support from the Compliance Committee when needed.

K. SUITABILITY AND CLIENT PROFILE

The objective of the suitability policy is to analyze, understand, and determine each client's investment profile to create an individualized investment policy that directly reflects their profile for PWM. For Perfin Infra and Perfin Equities, this includes offering appropriate products.

PWM Associates work more closely with prospective clients to, in addition to the suitability process described in Perfin's Distribution and Registration Manual, gather data on their current portfolio, evaluate investment objectives, and assess risk appetite. In these cases, the manager has its own methodology and policy defined for the client profile.

The goal is to identify and understand each client's characteristics to recommend suitable investments for their profile. The process will be guided by a form completed by the client alongside the responsible sales representative.

The profile will be determined by gathering various information from the client, such as (i) the investor's current portfolio; (ii) the percentage of loss they are willing to accept relative to their equity; (iii) their expected average annual return on investments; (iv) the expected liquidity level of the investments; (v) their reaction to investment devaluation; (vi) their investment history by asset class; (vii) their familiarity and experience with



investments; (viii) investing in securities of private issuers; and (ix) an evaluation of the client’s objectives.

The employee responsible for the client collects completed and signed documents, and Perfin analyzes them to determine the client’s profile. This analysis is redone at least every two years. Any change in the profile is communicated to the client, and their consent is requested and filed. The change notification is in writing and can be sent via email. Details of the suitability process are available in the Perfin Distribution and Registration Manual.

L. WHISTLEBLOWING CHANNEL

Any suspicion or violation of the provisions outlined in this Regulation or in any of the Perfin Policies must be reported through the Company’s Reporting Channel, accessible by both internal and external individuals at perfin.ethicspoint.com. Perfin guarantees the confidentiality of reports received, maintains the anonymity of the whistleblower, and in no way permits retaliation against good-faith whistleblowers.

M. FINAL PROVISIONS

This policy will be reviewed at least once a year. Despite the scheduled revisions, it can be changed without prior notice and without a set schedule if circumstances require it.

Compliance will notify Employees in a timely manner about the new version of this document and ensure it is accessible on the Managers' page within the worldwide network.

This Policy has been approved by the compliance committee, revokes all previous versions, and becomes effective on its approval date.

N. VERSION CONTROL AND GOVERNANCE

Date	Version	Approval
July 2023	Version 1	Strategic Council
October 2025	Version 2 and current	Strategic Council