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Risk Management Policy

1. OBJECTIVE

This Risk Management Policy ("Policy") of fama re.capital Ltda. ("FAMA" or the "Manager") aims to establish guidelines and procedures to monitor and manage the risks inherent to the activity of managing third-party assets, as well as the investment funds and securities portfolios under management ("Funds").

This Policy outlines the criteria and parameters used for managing different types of risks and their control points.

FAMA understands that the establishment of clear and well-defined rules not only meets regulatory requirements — especially CVM Resolution No. 175/22, CVM Resolution No. 21/21, and the ANBIMA Code of Regulation and Best Practices for the Management of Third-Party Resources—but also serves the best interest of its investors.

This Policy applies to the Investment Funds managed by FAMA, including Equity Investment Funds (FIA), Financial Investment Funds (FIF), and Credit Rights Investment Funds (FIDC), in compliance with the regulatory and risk-related specificities of each product.

It is important to highlight that, within the context of the Investment Policy of the FIDC IS Fund, the risk analysis must mandatorily include ESG factors, with explicit negative screening. Transactions involving assets linked to deforestation, slave labor, corruption, weapons production, coal mining, or any practices considered incompatible with the sustainability principles and corporate ethics set forth in the Fund's Regulation are prohibited. Risk assessment models must therefore incorporate this exclusionary filter as a criterion for the eligibility of counterparties and Credit Rights.

This Policy also applies to all Employees, as defined in the Compliance Manual, who are required to read, understand, and sign the Acknowledgment Term attached hereto as Annex I at the beginning of their relationship with FAMA. Any violations will be subject to the sanctions outlined in the aforementioned Manual.

2. RESPONSIBILITY AND GOVERNANCE

FAMA must maintain an up-to-date version of this Policy in ANBIMA's SSM System, as well as on its website (https://famarecapital.com).

The guidelines established in this Policy, the selection of metrics and control tools to be used, as well as procedures in the event of any non-compliance, are under the responsibility of the Director of Compliance, Risk and AML/CFT (Anti-Money Laundering and Counter-Financing of Terrorism).

It is important to note that the control and monitoring of market risk is also part of the management and investment decision-making process and is therefore a shared responsibility between the Chief Investment Officer and the Director of Compliance, Risk and AML/CFT, who holds the final decision on risk-related matters. This director has autonomy and may intervene if a suggested allocation is deemed inappropriate (e.g., in terms of investment liquidity and fund redemption timelines).

2.1. Director of Compliance, Risk and AML/CFT

The direct coordination of activities related to this Policy is the responsibility of the director designated as FAMA's risk management officer ("Director of Compliance, Risk and AML/CFT"), as specified in the company's bylaws.

Although the Director of Compliance, Risk and AML/CFT accumulates the responsibilities of both compliance and risk, as permitted by applicable regulations, they maintain full technical independence in these areas and serve as the ultimate decision-making authority for risk management, reporting solely, in functional terms, to the Executive Committee. The Director of Compliance, Risk and AML/CFT is directly responsible for monitoring the risks addressed in this Policy.

2.2. Compliance, Risk and AML/CFT Committee

FAMA's Compliance, Risk and AML/CFT Committee supports and oversees risk-related activities, including defining policies, controls, and guidelines, setting risk scenarios, and reviewing monitoring processes. It operates with autonomy and independence to supervise all risk activities.

Employees of the Manager must promptly report any events relevant to this Policy to the Director of Compliance, Risk and AML/CFT, who will determine an appropriate action plan. In cases of deviations from defined parameters, or in the event of atypical market situations or unaddressed scenarios, the Director may request assistance from the Compliance, Risk and AML/CFT Committee to decide on the appropriate action plan.

The rules regarding the composition, operation, and formalization of this Committee are defined in the Compliance Manual. Summary minutes of Committee meetings will be recorded and stored electronically in the Manager's compliance management system.

The Director of Compliance, Risk and AML/CFT, together with other Committee members, is responsible for the final determination of the measurement methods and systems used to monitor the risks described in this Policy, including exposure limits as defined in Annex II.

2.3. Risk Department

As shown in the organizational chart attached to this Policy (Annex III), the Manager's risk team consists of the Director of Compliance, Risk and AML/CFT and supporting professionals, all of whom have the necessary qualifications and experience to perform their functions. These professionals do not engage in portfolio management or in any activities that could compromise their independence, whether at the Manager or any other institution.

FAMA's Risk Department operates independently and is segregated from the Manager's other business areas. Analysts report directly to the Director of Compliance, Risk and AML/CFT regarding risk matters. The Risk Department also maintains direct communication with the Executive Board or senior management to report on the results of its activities, and it participates in the meetings of the Compliance, Risk and AML/CFT Committee.

Finally, the Risk Department is expected to act proactively and continuously to alert, inform, and recommend actions to the Investment Committee in the event of any breaches of regulatory or internally established limits, in accordance with the following section.

3. MONITORING AND INFORMATION FLOW

The Asset Management team must monitor, on a daily basis — either after market close each day or before the market opens the following day — the investment limits of the investment vehicles to ensure adherence to strategies, risk limits, rules, restrictions, and prohibitions outlined in each Fund's documentation and applicable regulations, prior to executing operations. This pre-trade compliance control is conducted by FAMA's internal control systems.

<u>Monitoring of Breaches</u>

In the event of a breach, the Director of Compliance, Risk and AML/CFT will notify the management team responsible for the strategy and assess whether rebalancing is required in the case of a passive breach.

The Manager uses an internal system to monitor limits and maximum exposure percentages, aiming to minimize the likelihood of active breaches. However, natural market fluctuations may result in passive breaches.

A passive breach refers to exogenous factors beyond the Manager's control that cause unpredictable and significant changes in a Fund's net asset value or in general market conditions. In such cases, the rebalancing period is fifteen (15) consecutive days, as per applicable regulations. The Risk Department is responsible for ensuring that rebalancing is achieved within this timeframe.

Notwithstanding the above, if a breach does not qualify as passive, the Manager must immediately halt any activity that could exacerbate the breach and take prompt action to reduce the non-compliant positions.

In such cases, the Director of Compliance, Risk and AML/CFT will immediately notify the Chief Investment Officer so that the necessary rebalancing actions can be taken as of the next market opening.

For each active breach, a member of the Trading team must notify the Compliance Department of the occurrence and provide justification. This information will be entered into the Manager's compliance management system and forwarded to the Director of Compliance, Risk and AML/CFT. By the following day, the Risk Department must contact the fiduciary administrator of the respective Fund to confirm and justify the breach and to report the expected timeframe for rebalancing.

Exceptions to this rule—such as an inability to rebalance within the regulatory timeframe due to market conditions—must be formalized in writing by the Risk Department, including justification from the Chief Investment Officer, and sent to the Fund's fiduciary administrator so they can notify the CVM (Brazilian Securities Commission) as required by applicable regulations.

The use of any legal structure, product format, or acquisition of financial assets that—either directly or indirectly—aims to economically simulate exposure to assets prohibited by the Fund's investment policy and/or by current regulations is strictly forbidden, including any circumvention of the restrictions provided in CVM Resolution No. 175/22 and related rules. The characterization of a Fund's predominant exposure will be continuously monitored by the Risk Department.

In addition to the foregoing, the Risk Department may perform a subjective analysis of portfolio concentration and, if a significant risk is identified, must request an extraordinary meeting of the Compliance, Risk and AML/CFT Committee to address the issue. The department may also propose an action plan to mitigate the identified risk.

During the Compliance, Risk and AML/CFT Committee meetings, the procedures regarding reports produced by the Risk Department are reviewed. If needed, new risk metrics and parameters will be analyzed and defined.

If any procedures defined in this Policy are not followed, or if a risk situation arises that is not covered by this Policy, the Director of Compliance, Risk and AML/CFT must submit the matter to the Compliance, Risk and AML/CFT Committee with the goal of:

(i) Establishing an action plan to promptly bring the portfolios back into compliance with the current Policy; and

(ii) (ii) Evaluating the need for adjustments to the procedures and controls in place.

In any such case, the Director of Compliance, Risk and AML/CFT is authorized to order the purchase or sale of positions to ensure portfolio compliance.

3. 1. Risk Reports

The Risk Department sends a monthly electronic report to members of the Asset Management team containing information on exposure, liquidity, and portfolio sensitivity to changes in asset prices. If any Fund exceeds its risk limits, this matter must be included in the report.

The Investment Committee of the funds managed by FAMA must review the risk report at least once a month.

A daily liquidity analysis of the Funds is also conducted, aggregating all positions to form the Manager's total portfolio. These data are used to analyze the overall liquidity profile, indicating what percentage of the portfolio can be converted to cash within a given number of days. The limits for this analysis are established in the Liquidity Risk Control and Management Policy, which is available to all investment professionals and third parties upon request. If necessary, a separate report will be sent to the Director of Compliance, Risk and AML/CFT, as well as to the Investment Committee.

4. RISKS

4.1. Market Risks

Market risk refers to the risk of variation in the value of the assets comprising the Funds. The value of securities may increase or decrease according to fluctuations in market prices and quotations, interest rates, and the results of the issuing companies. In the event of a decline in the value of these assets, the Fund's net asset value may be adversely affected. This decline in prices may be temporary; however, there is no guarantee that it will not persist for long and/or indefinite periods. At certain times, market volatility may be high, which can lead to sharp fluctuations in the Funds' results.

The Funds have a medium/long-term investment horizon. The assets that make up the investment portfolios are selected through a rigorous analysis that considers factors such as liquidity, quality of management, operational/financial performance, and ESG aspects.

FAMA adopts an investment philosophy based on structured analysis, with a focus on the medium and long term, always taking into account the risks associated with the macroeconomic scenario, interest rate fluctuations, and the liquidity of the assets under management. We understand that economic fluctuations—such as changes in monetary policy, inflationary trends, and shifting growth expectations—affect the assets under management in different ways, requiring continuous monitoring and a flexible approach by the management and risk team.

In the case of the FIA fund, although valuation remains an important tool in the decision-making process, we do not use metrics such as target price or multiples in isolation. We seek to understand whether market prices offer a sufficient margin of safety in relation to our qualitative perceptions of the business model, corporate governance, and the company's sustainability. Sector analysis and assessment of regulatory, climate, and reputational risks are also part of this process.

For Credit Rights Investment Funds (FIDC): The main market risks stem from the pricing and liquidity of credit rights and their potential concentration by assignor or sector. Risk analysis includes the financial strength of the debtors, the quality of guarantees, and the historical performance of the assigned assets. Monitoring is conducted based on internal and regulatory criteria, considering the fund's collateral structure and its impact on unit pricing.

For Long-Term Financial Investment Funds (FIF – Private Credit): Market risk is primarily related to the mark-to-market pricing of private credit assets and interest rate curve fluctuations. Pricing follows objective criteria and is monitored based on observable prices from platforms recognized by the market. The portfolio's average maturity is consistent with the fund's long-term nature, with systematic monitoring to ensure regulatory compliance and alignment with the fund's liabilities.

Each analyst is responsible for conducting in-depth qualitative and quantitative studies to support investment discussions at FAMA. Financial projections for the assets are always prepared under at least three scenarios: conservative, optimistic, and neutral. Through these scenarios, we aim to understand the company's value creation agenda, assess its risks, and compare this with its stock market valuation.

Portfolio composition seeks to balance profitability and risk control through a diversified portfolio, respecting regulatory and internal concentration limits by asset, sector, issuer, and maturity. Asset selection is based on technical, qualitative, and quantitative criteria, supported by economic projections that consider alternative growth, inflation, and external shock scenarios.

4.2. Risks Related to the Use of Derivatives and Financial Leverage

The use of derivatives is prohibited for all Funds. Financial leverage is also not used as part of the investment strategy.

Although the use of derivatives is currently prohibited, should they be used in the future, FAMA will observe the concept of Adjusted Net Exposure to correctly reflect the portfolio's actual risk, considering the net effects of derivative positions, in accordance with CVM Resolution No. 175/22.

4.3. Credit/Counterparty Risk

Credit Risk refers to the possibility of default by issuers of fixed income assets, obligors in credit rights, or counterparties to transactions carried out by the Funds. Such default may involve non-payment of principal, interest, or other financial charges, negatively impacting the Funds' returns and net asset value.

Exposure to credit risk varies according to the nature of the assets and the investment policy of each Fund:

FIF (Private Credit Financial Investment Fund): Credit analysis involves rigorous assessment of issuers based on quantitative factors (liquidity ratios, indebtedness, repayment capacity) and qualitative factors (governance, sector, sustainability). Ratings, where available, are considered as a supplementary input. Internal limits are established for concentration by issuer, sector, maturity, and risk level, along with stress tests and macroeconomic scenario projections.

FIDC (Credit Rights Investment Fund): Analysis is performed on the assignor, the obligor (debtor), the credit right collateral, and the associated guarantees. The FIDC structure is analyzed for subordination, risk retention, overcollateralization, and eligibility criteria, as set forth in Annex IV of CVM Resolution 175. There is continuous monitoring of delinquency, prepayment, and concentration rates, as well as periodic due diligence on the originator.

FIA (Equity Investment Fund): Although the primary focus is investing in publicly traded equities, any cash management or liquidity reserve investments in credit assets—such as units of third-party funds or government bonds—are also monitored from the perspective of counterparty and liquidity risk.

Counterparty Risk refers to the potential default in settling the transactions carried out.

Regarding counterparty risk (failure to fulfill settlement obligations related to financial asset transactions), it is noted that Fund investments on B3 are conducted through pre-selected brokerage firms. In these cases, we consider the counterparty risk associated with the selected Broker until the trade is settled by B3. Settlement occurs two days after order execution.

The following controls are implemented by the Manager to mitigate this type of risk:

(i) exposure limit control for brokerage firms;

(ii) pre-trade control of daily portfolios;

(iii) implementation of filters in the order entry system to block non-approved assets;

(iv) evaluation of counterparties' operational efficiency; and

(v) end-of-day trade verification and counterparties' report reconciliation.

Additionally, FAMA has a Private Credit Acquisition and Monitoring Policy, as provided in CVM Resolution 175, with detailed criteria and procedures for the selection, monitoring, and mitigation of credit risks.

4.4. Concentration Risk

Concentration risk is associated with excessive allocation of resources in assets from the same issuer, obligor, assignor, economic sector, or common risk factor, which may amplify the impact of specific adverse events.

The Fund portfolio construction process follows a bottom-up approach, with a fundamental analysis of each asset to identify relative value opportunities. A complementary top-down analysis is applied to avoid excessive exposure to macroeconomic factors, sectors, or issuers.

In accordance with the Normative Annexes of CVM Resolution 175, the Funds observe the following limits:

FIA: exposure per issuer limited to 15% of the Fund's net assets;

FIF (Private Credit): credit issuer concentration is monitored according to internal criteria for rating, liquidity, and type of instrument, observing both regulatory and internal limits, with segmentation by sector, risk level, and maturity;

FIDC: concentration by obligor and assignor is limited by specific internal rules, which consider the risk profile of the asset and mitigation mechanisms such as subordination and overcollateralization. The criteria are defined according to the Private Credit Acquisition and Monitoring Policy.

Changes in the financial condition of issuers, assignors, or sectors, or shifts in market perception, may adversely impact the price or liquidity of the assets, potentially requiring their sale under unfavorable conditions, thus affecting the Fund's unit value.

FAMA uses a systemic tool to monitor orders and positions, issuing automatic alerts when predefined concentration limits are reached, contributing to the dynamic control of this risk.

4.5. Liquidity Risk

Liquidity risk arises from the possibility that the Funds may be unable to meet redemptions or operational obligations within the established timeframes without incurring significant losses from the forced sale of assets.

FAMA’s Compliance, Risk, and AML Director will adopt the following mitigation procedures:

- Setting maximum exposure limits per asset and per company, based on average trading volume and conservative criteria, applied differently for FIA, FIF, and FIDC;
- Classification of illiquid assets using an objective and verifiable methodology, including an analysis of trading history and price dispersion. The total position in assets classified as illiquid is limited to 20% of each Fund's net assets, in accordance with market best practices;
- Performing liquidity stress tests, considering adverse scenarios for each Fund, based on portfolio characteristics and investor redemption timelines;
- Maintaining liquidity buffers and daily monitoring of the Funds’ positions, integrated into the Liquidity Risk Management Policy, which details additional procedures.

The procedures described herein are aligned with the requirements of Normative Annexes III, IV, and V of CVM Resolution 175/2022 and are periodically reviewed to ensure their effectiveness and adherence to market conditions.

Other liquidity risk control and management procedures can be found in the Liquidity Risk Management Control Policy.

4.6. Operational Risk

Operational risk arises from inconsistent or inadequate information, processing, and operational systems, or from internal control failures. These are risks stemming from process weaknesses, which may be caused by the lack of internal regulations and/or documentation on policies and procedures, potentially leading to errors in performing activities and resulting in unexpected losses.

Operational risk is addressed through frequent validation of the various systems in operation at FAMA, such as software, telephone systems, internet, and others. Operational control activities include trade logging and monitoring, parallel calculation of fund unit values, tracking of asset and liability valuation, settlement of financial transactions, and control and maintenance of individual investor positions.

In addition, FAMA maintains a Contingency and Business Continuity Plan, which defines procedures to be followed in the event of contingencies, aimed at preventing operational disruptions due to technical issues. Strategies and action plans have been established to ensure that FAMA’s essential services are properly identified and preserved following unexpected events or disasters.

According to this Policy, system, operational, and allocation errors must be identified and duly justified by the responsible employee. Justifications must be clear and objective. The Risk Area is responsible for logging the incident into the compliance management system used by the Manager, including the profit or loss incurred from the correction. The Risk Area, together with the Compliance, Risk, and AML Committee, will decide who is to bear any resulting loss, taking into account the specific characteristics of the case.

4.7. Legal Risk

Legal risk arises from the potential legal challenge to contract execution, legal proceedings, or rulings that are contrary to or different from those expected by FAMA, and which may cause significant losses or disruptions negatively affecting FAMA’s operations and/or organization.

4.8. Systemic Risk

Systemic risk arises from the financial difficulties of one or more institutions that may cause substantial harm to other institutions or disrupt the normal operation of the financial system as a whole.

5. POLICY REVIEW AND ADHERENCE TESTING

This Policy, including the methodology set forth herein, must be reviewed at least every 24 months or sooner if adherence testing reveals inconsistencies that require revision, taking into account (i) regulatory changes; (ii) discussions with other market participants; and (iii) any deficiencies identified, among other factors. This Policy may also be reviewed at any time, whenever the Risk Department, through its Director of Compliance, Risk and AML/CFT, deems it necessary.

The purpose of reviewing this Policy is to enable the ongoing monitoring, measurement, and adjustment of the risks inherent to each of the managed securities portfolios, as well as to improve internal controls and processes.

Additionally, on an annual basis, the Compliance, Risk, and AML/CFT area must carry out adherence/effectiveness testing of the metrics and procedures set forth herein or defined by the Compliance and Risk Committee.

The results of such testing and reviews must be discussed by the Compliance, Risk, and AML/CFT Committee. Any deficiencies or recommendations should be included in the annual compliance and risk report, which must be presented to FAMA's governing bodies no later than April 30 of each year.

In addition to adherence testing, the Risk Department will conduct semi-annual stress tests to assess the resilience of the Funds under extreme market and liquidity conditions, following the methodology defined by the Compliance, Risk, and AML/CFT Committee.

ANNEX I

STATEMENT OF COMMITMENT

TO THE RISK MANAGEMENT POLICY

I, _______________________________, holder of CPF/MF nº _______________, in my capacity as ___________________ (cargo) da (position) at FAMA, hereby declare that I have received, read, and understood the Manager's Risk Management Policy, prepared in accordance with CVM Resolution No. 175/22 and other applicable regulations. I confirm that I have full knowledge of all rules and procedures contained herein.

Accordingly, I undertake to fully comply with the Policy and acknowledge the sanctions applicable in cases of violation of its provisions.

_____________, ___ of ________, 20__

[Employee Signature]

ANNEX II
FAMA RISK LIMITS

Risk limits by issuer, asset class, economic sector, liquidity, and concentration are defined according to the nature and investment policy of each fund managed by FAMA.

Each fund observes the legal and regulatory limits established under **CVM Resolution No. 175/22**, in particular those set forth in the applicable Regulatory Annexes:

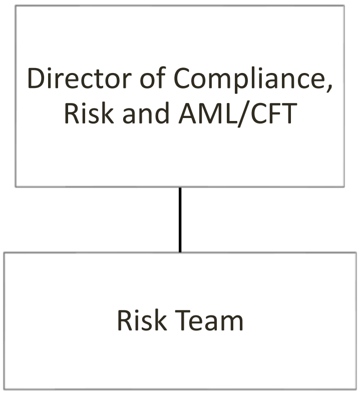
- Regulatory Annex III – Fixed Income Investment Funds (FIF): applicable to the FAMA Crédito Privado FIF;
- Regulatory Annex IV – Credit Rights Investment Funds (FIDC): applicable to the FAMA FIDC;
- Regulatory Annex V – Equity Investment Funds (FIA): applicable to the FAMA Master FIA.

In addition, internal limits, prohibitions, and specific provisions for each fund are detailed in their respective Investment Policies, which form part of their regulations and are available on the CVM website (www.cvm.gov.br), as per their most recent versions.

The monitoring and control of compliance with these limits are carried out using internal systems, under the supervision of FAMA’s Risk Department, ensuring continuous adherence to regulatory frameworks and to the manager’s prudent risk management policy.

ANNEX III

ORGANIZATIONAL CHART



Roles and Responsibilities:

Director of Compliance, Risk and AML/CFT: as outlined in the Risk Management Policy.

Risk Team: In addition to responsibilities defined by the Director of Compliance, Risk and AML/CFT, the Risk Team is responsible for (i) focusing efforts on the analysis of risks, their magnitude and impacts on operations, enabling the management of occurrences and development of corrective and mitigation action plans for recurring issues; (ii) verifying compliance with this Policy, by preparing and forwarding risk exposure reports for each Fund; and (iii) supervising any third parties contracted for monitoring purposes, as applicable. The Risk Team operates independently from the portfolio management area and has technical autonomy as required under CVM Resolution No. 175/22.

Version Control	
Jul-2015	Version A
Jun-2016	Version 0
Jan-2019	Version 1
Oct-2020	Version 2
Oct-2022	Version 3
Apr-2025	Version 4