

## REFERENCE FORM – LEGAL ENTITY

Pursuant to Annex E of CVM Resolution No. 21, of February 25, 2021 (Information provided based on positions as of November 30, 2024)

### MIRADOURO ASSET MANAGEMENT LTDA.

Preparation date: February 7, 2025

SECURITIES PORTFOLIO MANAGERS
<b>1. Identification of persons responsible for the content of this form</b>
<b>DIMAS GUILHERME DE CAMPOS FUNGHI</b> CPF/MF No. 099.997.866-77 Contact: dimas.campos@miradouro.co (31) 99862-2987 Title: Director responsible before the Brazilian Securities and Exchange Commission ("CVM") for the exercise of the securities portfolio management activity ("Management Director").
<b>LICÉRIO TIBÚRCIO PEREIRA CAMPANATI</b> CPF: 442.381.936-87 Contact: licerio@miradouro.co (31) 99703-1960 Title: Risk and Compliance Director ("Compliance Director").
<b>1.1. Declarations of directors responsible for securities portfolio management and for the implementation and compliance with internal rules, procedures and controls and CVM Resolution No. 21, attesting that:</b>
a . they have reviewed the reference form b the set of information contained therein is a true, accurate, and complete picture of the company's structure, business, . policies, and practices
I, <b>DIMAS GUILHERME DE CAMPOS FUNGHI</b> , responsible for securities portfolio management, declare for the applicable purposes that (a) I have reviewed the reference form, and (b) the set of information contained therein is a true, accurate, and complete picture of the company's structure, business, policies, and practices.  São Paulo, February 7, 2025.  _____ <b>DIMAS GUILHERME DE CAMPOS FUNGHI</b>

I, **LICÉRIO TIBÚRCIO PEREIRA CAMPANATI**, responsible for the implementation and compliance with internal rules, procedures, and controls, declare for the applicable purposes (a) that I have reviewed the reference form, and (b) that the set of information contained therein is a true, accurate, and complete picture of the company's structure, business, policies, and practices.

São Paulo, February 7, 2025.

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**LICÉRIO TIBURCIO PEREIRA CAMPANATI**

## 2. Company history

### 2.1. Brief history of the company's incorporation

Miradouro Asset Management Ltda. ("Miradouro") was incorporated on August 12, 2024, and is currently in its pre-operational phase.

### 2.2. Describe the relevant changes the company has undergone in the last 5 (five) years, including:

- a . main corporate events, such as incorporations, mergers, spin-offs, divestitures, and acquisitions of corporate control
- b . scope of activities
- c . human and computational resources
- d . rules, policies, procedures, and internal controls

None.

## 3. Human Resources

### 3.1. Describe the company's human resources, providing the following information:

a. number of partners	04
b. number of employees	05
c. number of outsourced personnel	00
d. indicate the area of activity of the directors responsible for securities portfolio management and the respective professional certification exams taken pursuant to art. 3, III, c/c art. 4, III, of CVM Resolution No. 21.	DIMAS GUILHERME DE CAMPOS FUNGHI CPF/MF No. 099.997.866-77 Contact: dimas.campos@miradouro.co (31) 99862-2987 Title: Management Director Individual manager approved by the CVM (CGA – Anbima).
e. list of natural persons registered with the CVM as securities portfolio managers who act exclusively as agents, employees, or partners of the company, as well as their respective areas of activity.	DIMAS GUILHERME DE CAMPOS FUNGHI CPF/MF No. 099.997.866-77 Contact: dimas.campos@miradouro.co (31) 99862-2987 Title: Management Director Individual manager approved by the CVM (CGA – Anbima).

## 4. Auditors

### 4.1. With respect to independent auditors, indicate, if any:

a. company name	
b. date of service engagement	
c. description of contracted services	

No independent auditors have been engaged.

<b>5. Financial resilience</b>	
<b>5.1. Based on financial statements, confirm:</b>	
c. whether revenue from fixed-base fees referred to in item 9.2.a is sufficient to cover the company's costs and investments in the securities portfolio management activity	No.
d. whether the company's net equity represents more than 0.02% of the financial resources under management referred to in item 6.3.c and more than R\$ 300,000.00 (three hundred thousand reais)	No.
5.2. Financial statements and report referred to in §5 of art. 4 of CVM Resolution No. 21	Not applicable
<b>6. Scope of activities</b>	
<b>6.1. Describe in detail the activities carried out by the company, indicating at a minimum:</b>	
a. types and characteristics of services provided (discretionary management, wealth planning, controlling, treasury, etc.)	Upon obtaining its registration as an asset manager, Miradouro will manage, predominantly, discretionary portfolios and investment funds, primarily FIDCs (Receivables Investment Funds), without prejudice to subsequently managing other types of funds, including other types of structured funds. The target audience of the funds to be managed by Miradouro will predominantly consist of qualified and professional investors.
b. types and characteristics of products managed (investment funds, equity participation funds, real estate investment funds, receivables investment funds, index funds, investment clubs, discretionary portfolios, etc.)	Still in its pre-operational phase, Miradouro will act as a manager of discretionary portfolios and, predominantly, FIDCs (Receivables Investment Funds), without prejudice to managing portfolios of other structured funds in the future.
c. types of securities subject to management	Miradouro will engage in the management of discretionary portfolios and investment funds, predominantly FIDCs (Receivables Investment Funds), without prejudice to subsequently managing other types of funds, including other types of structured funds.
d. whether it engages in the distribution of shares of investment funds for which it is the manager or administrator	Miradouro may distribute shares of funds for which it is the manager.

**6.2. Briefly describe other activities carried out by the company that are not securities portfolio management, highlighting:**

a. the potential conflicts of interest between such activities; and

Miradouro will perform the functions of an asset manager and may also distribute shares of funds under its management, pursuant to applicable regulations and self-regulation. Miradouro will not perform any other functions besides asset management and the distribution of shares of funds under its management, which does not create conflicts of interest between them. Furthermore, potential conflicts of interest between Miradouro's activities and other companies in its economic group, which carry out insurance brokerage, investment advisory, and investment consulting activities, will be duly mitigated through the physical and informational segregation adopted by Miradouro. Miradouro will manage discretionary portfolios and investment fund portfolios and their classes. These activities require specific registration and are subject to certain requirements, including the complete segregation of its management and compliance activities. Accordingly, Miradouro will ensure the complete segregation of its activities, adopting operational procedures aimed at the physical segregation of facilities when necessary. In compliance with CVM Resolution No. 21 and the ANBIMA Code, Miradouro maintains physical segregation for the performance of the aforementioned activity, in relation to the other areas of the company, with: (i) segregation of the area of the company where the securities portfolio management activity is carried out; and (ii) segregation and non-sharing of equipment (including printers, computers, telephones, and copiers) for the different areas of the company, where members of one area may not use equipment from another area. Alongside information security, controlled access to files available on the network will be established for each area. Additionally, for security purposes, access to Miradouro's information may be identified by the user who accessed it, in order to maintain control over access to information and prevent information leakage. Finally, it should be noted that, in a potential conflict of interest situation, Miradouro will perform its activities with loyalty toward its clients, avoiding practices that could breach the fiduciary relationship maintained with them and, in the event of a conflict of interest, will inform the client that it is acting in a conflict of interest and the sources of such conflict, prior to rendering services.

<p>b. information about activities carried out by parent companies, subsidiaries, affiliates, and companies under common control of the manager, and the potential conflicts of interest between such activities.</p>	<p>Except as stated above, Miradouro has not identified activities carried out by its parent companies, subsidiaries, and/or affiliates that could represent potential conflicts of interest. Below is the list of companies affiliated with Miradouro: XLS Participações S.A. (CNPJ: 47.907.799/0001-68) – Activity: corporate equity interests. Mesa Corporate Assessoria de Negócios e Gestão Financeira Ltda. (CNPJ: 46.609.885/0001-21) – Activities: financial institution correspondents, document preparation and specialized administrative support services, business consulting and management activities, financial investment consulting services and intermediation for obtaining loans, intermediation and agency of services and business, combined office and administrative support services, and text typing and form completion services. Mesa Corporate Corretora de Seguros Ltda. (CNPJ: 53.308.216/0001-85) – Activities: Insurance brokerage for damage, life, capitalization, and open supplementary pension lines. Miradouro Consultoria e Assessoria de Investimentos Ltda. (CNPJ: 47.226.850/0001-76) – Activities: securities consulting. It should be noted that this company's activities will be terminated upon Miradouro's registration as an asset manager. Py Investimentos AI Ltda. (CNPJ: 50.909.157/0001-02) – Investment agents in financial applications. Vlop Cursos e Processamento de Dados (CNPJ: 41.666.459/0001-06) – Activities: electronic data processing and professional and managerial development training. SLX Assessoria de Negócios Ltda. (CNPJ: 56.906.885/0001-47) – Activities: financial institution correspondents, document preparation and specialized administrative support services, business consulting and management activities, financial investment consulting services, intermediation for obtaining loans, intermediation and agency of services and business, combined office and administrative support services, and text typing and form completion services.</p>
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**6.3. Describe the profile of investors in funds and discretionary portfolios managed by the company, providing the following information:**

a. number of investors (total and divided between funds and portfolios for qualified and non-qualified investors)	0
b. number of investors, divided by:	
i. natural persons	0
ii. legal entities (non-financial or institutional)	0
iii. financial institutions	0
iv. open supplementary pension entities	0
v. closed supplementary pension entities	0
vi. social security schemes	0
vii. insurance companies	0
viii. capitalization and financial leasing companies	0
ix. investment clubs	0
x. investment funds	0
xi. non-resident investors	0
xii. others (specify)	0
c. financial resources under management (total and divided between funds and portfolios for qualified and non-qualified investors)	0
d. financial resources under management invested in foreign financial assets	0
e. financial resources under management of each of the 10 (ten) largest clients (names are not required)	0
f. financial resources under management, divided by investors:	
i. natural persons	0
ii. legal entities (non-financial or institutional)	0
iii. financial institutions	0
iv. open supplementary pension entities	0
v. closed supplementary pension entities	0
vi. social security schemes	0
vii. insurance companies	0
viii. capitalization and financial leasing companies	0
ix. investment clubs	0
x. investment funds	0
xi. non-resident investors	0
xii. others (specify)	0

<b>6.4. Provide the value of financial resources under management, divided by:</b>	
a. equities	0
b. debentures and other fixed income securities issued by non-financial legal entities	0
c. fixed income securities issued by financial legal entities	0
d. shares of equity investment funds	0
e. shares of private equity funds	0
f. shares of real estate investment funds	0
g. shares of receivables investment funds	0
h. shares of fixed income investment funds	0
i. shares of other investment funds	0
j. derivatives (market value)	0
k. other securities	0
l. government securities	0
m. other assets	0
6.5. Describe the profile of asset managers of securities portfolios in which the administrator carries out fiduciary management activities	Not applicable
6.6. Provide other information the company deems relevant	Not applicable

<b>7. Economic group</b>	
<b>7.1. Describe the economic group in which the company operates, indicating:</b>	
a. direct and indirect controlling entities	Miradouro's direct controlling entity is the partner XLS Participações S.A. (CNPJ: 47.907.799/0001-68), holding 99.997% of its share capital. As indirect controlling shareholders, Miradouro has the following indirect partners who together hold 53.85% of its share capital: (i) Vinicius Melo de Araújo (CPF: 063.051.676-64) and (ii) Fontaine Participações Ltda. (CNPJ: 36.648.207/0001-14), which in turn is controlled by its sole partner, Murilo de Oliveira Amaral (056.197.956-16).
b. subsidiaries and affiliates	Miradouro has no subsidiaries. As affiliates, Miradouro has the following companies: Vlop Cursos e Processamento de Dados – CNPJ No. 41.666.459/0001-06 Py Investimentos AI Ltda. – CNPJ No. 50.909.157/0001-02 Mesa Corporate Assessoria de Gestão de Negócios e Gestão Financeira Ltda. – CNPJ No. 46.609.885/0001-21 Mesa Corporate Corretora de Seguros Ltda. – CNPJ No. 53.308.216/0001-85 Miradouro Consultoria e Assessoria de Investimentos Ltda. – CNPJ No. 47.226.850/0001-76 SLX Assessoria de Negócios Ltda. - CNPJ No. 56.906.885/0001-47
c. the company's equity interests in group companies	None.
d. equity interests of group companies in the company	Only XLS Participações S.A. (direct controlling entity) holds a direct interest in Miradouro.
e. companies under common control	Miradouro has the following companies under common control: Vlop Cursos e Processamento de Dados – CNPJ No. 41.666.459/0001-06 Py Investimentos AI Ltda. – CNPJ No. 50.909.157/0001-02 Mesa Corporate Assessoria de Gestão de Negócios e Gestão Financeira Ltda. – CNPJ No. 46.609.885/0001-21 Mesa Corporate Corretora de Seguros Ltda. – CNPJ No. 53.308.216/0001-85 Miradouro Consultoria e Assessoria de Investimentos Ltda. – CNPJ No. 47.226.850/0001-76 SLX Assessoria de Negócios Ltda. - CNPJ No. 56.906.885/0001-47
7.2. If the company wishes, insert an organizational chart of the economic group in which the company operates, provided it is consistent with the information presented in item 7.1.	Not applicable.

<b>8. Operational and administrative structure</b>	
<b>8.1. Describe the company's administrative structure as established in its articles of association or internal regulations, identifying:</b>	
a. responsibilities of each body, committee, and technical department	Miradouro will have the following directorates: (i) Management Directorate – responsible for asset management and distribution of investment fund shares managed by Miradouro; (ii) Risk and Compliance Directorate – responsible for risk management and internal controls and compliance activities; and (iii) Operations Directorate – responsible for Miradouro's administrative activities. As for its committees, Miradouro will have: - Liquidity Risk Committee, composed of the Asset Management and Risk and Compliance teams, to review the liquidity of assets or significant changes in liabilities. This committee will meet monthly but may be convened more frequently as needed by any of the parties involved. - Credit Risk Committee, composed of the Asset Management and Risk and Compliance teams, to periodically evaluate and monitor the issuers and securities in managed portfolios, in order to manage the various credit risks and minimize any problems that may arise. This committee will meet twice a week but may be convened more frequently as needed by any of the parties involved. - Allocation Committee, composed of the Asset Management team, to periodically evaluate and monitor the macroeconomic environment and identify market opportunities to guide the team's activities. This committee will meet once a week but may be convened more frequently as needed by any of the parties involved.
b. with respect to committees, their composition, frequency of meetings, and how their decisions are recorded	Miradouro will have: - Liquidity Risk Committee, composed of the Asset Management and Risk and Compliance teams, to review the liquidity of assets or significant changes in liabilities. This committee will meet monthly but may be convened more frequently as needed by any of the parties involved. - Credit Risk Committee, composed of the Asset Management and Risk and Compliance teams, to periodically evaluate and monitor the issuers and securities in managed portfolios, in order to manage the various credit risks and minimize any problems that may arise. This committee will meet twice a week but may be convened more frequently as needed by any of the parties involved. - Allocation Committee, composed of the Asset Management team, to periodically evaluate and monitor the macroeconomic environment and identify market opportunities to guide the team's activities. This committee will meet once a week but may be convened more frequently as needed by any of the parties involved. The decisions of all committees will be recorded in writing in minutes, which will be kept on file at Miradouro's headquarters.
c. with respect to members of the board of directors, their individual responsibilities and powers	Miradouro will have the following directors: (i) Management Director – responsible for asset management and distribution of investment fund shares managed by Miradouro; (ii) Risk and Compliance Director – responsible for risk management and internal controls and compliance activities; and (iii) Operations Director – responsible for Miradouro's administrative activities.
8.2. If the company wishes, insert an organizational chart of the company's administrative structure, provided it is consistent with the information presented in item 8.1.	Not applicable.

**8.3. With respect to each of the directors referred to in items 8.4, 8.5, 8.6, and 8.7 and the members of the company's committees relevant to the securities portfolio management activity, provide the following information in tabular form:**

a. name	DIMAS GUILHERME DE CAMPOS FUNGHI
b. age	36 years old
c. profession	Business Administrator
d. CPF or passport number	099.997.866-77
e. position held	Management Director
f. date of appointment	August 12, 2024
g. term of office	Indefinite
h. other positions or functions held at the company	Distribution Director
a. name	LICÉRIO TIBÚRCIO PEREIRA CAMPANATI
b. age	64 years old
c. profession	Business Administrator
d. CPF or passport number	442.381.936-87
e. position held	Risk and Compliance Director
f. date of appointment	August 12, 2024
g. term of office	Indefinite
h. other positions or functions held at the company	None.

<b>8.4. With respect to directors responsible for securities portfolio management, provide:</b>	
<b>a. curriculum vitae, containing the following information:</b>	DIMAS GUILHERME DE CAMPOS FUNGHI
i. completed courses;	Business Administration at the Federal University of Minas Gerais – UFMG, completed in 2011. Postgraduate degree in Project Management at PUC – Minas Gerais, Brazil, completed in 2016. Degree in Accounting Sciences from IBMEC – Minas Gerais, Brazil, in 2018.
ii. approval in professional certification exam	Individual manager approved by the CVM (CGA – Anbima).
iii. main professional experience during the last 5 years, indicating:	
company name	MIRADOURO ASSET MANAGEMENT LTDA.
position and functions associated with the position	Managing partner
main activity of the company in which such experience occurred	Asset Management
start and end dates of the position	2024 to present.
company name	Ernst & Young – EY
position and functions associated with the position	RISK SENIOR MANAGER
main activity of the company in which such experience occurred	Consulting.
start and end dates of the position	09/30/2011 to 11/03/2021

**8.5. With respect to the director responsible for the implementation and compliance with rules, policies, procedures, and internal controls and CVM Resolution No. 21, provide:**

<b>LICÉRIO TIBÚRCIO PEREIRA CAMPANATI</b>	
a. curriculum vitae, containing the following information:	
i. completed courses;	Degree in Business Administration – Faculdade Ibero Americana – SP, 1987. MBA in Leadership and Decision-Making, from ISE Business School, SP, associated with IESE Business School, School of Business Management of the University of Navarra – Spain, 2013.
ii. approval in professional certification exam (optional)	Febraban Professional Certification – BB100 – Complete Banking Correspondent + LGPD - General Data Protection Law, 2022. Febraban Certification - PLDFT - Anti-Money Laundering and Counter-Terrorism Financing for Banking Correspondents, 2022.
iii. main professional experience during the last 5 years, indicating:	
company name	VRLC CURSOS E PROCESSAMENTO DE DADOS LTDA.
position and functions associated with the position	Managing partner
main activity of the company in which such experience occurred	Courses and Data Processing
start and end dates of the position	Since 2021 to present.
company name	EINS CAPITAL ASSESSORIA E CONSULTORIA LTDA.
position and functions associated with the position	Corporate Banking Manager
main activity of the company in which such experience occurred	Intermediation of financial transactions in the capital, insurance, and banking markets
start and end dates of the position	June 2019 to December 2019

<b>8.6. With respect to the director responsible for risk management, if not the same person indicated in the previous item, provide:</b>	
a. curriculum vitae, containing the following information:	See information described in item 8.5 above, which is the same applicable to these items.
<b>8.7. With respect to the director responsible for the distribution of investment fund shares, if not the same person indicated in item 8.4, provide:</b>	
a. curriculum vitae, containing the following information:	See information described in item 8.4 above, which is the same applicable to these items.
<b>8.8. Provide information on the structure maintained for asset management, including:</b>	
a. number of professionals	02
b. nature of activities carried out by its members	Internal analysis activity for investment decision-making by the Management Director.
c. information systems, routines, and procedures involved	Systems and resources provided by Refinitiv/LSEG and Comdinheiro are used. In addition, market information is gathered through newsletters and internal and external meetings. Miradouro's asset management area will have as its routine and procedures: (i) internal analysis, verification, and search for investment opportunities for portfolios managed by Miradouro; (ii) evaluation of investment, return, and divestment conditions for investment decision-making; and (iii) monitoring and evaluation of portfolios under management, in order to seek the best return for Miradouro's clients.

**8.9. Provide information on the structure maintained for permanently verifying compliance with applicable legal and regulatory standards and for supervising services provided by contracted third parties, including:**

a. number of professionals	02
b. nature of activities carried out by its members	Once in operational phase, Miradouro will have two professionals dedicated to the permanent verification of compliance with legal and regulatory standards. The professionals in this area must ensure compliance with applicable laws, regulatory standards, and internal procedures, in order to preserve the interests, image, and reputation of Miradouro and its officers. In this regard, they will issue opinions and/or legal opinions indicating to Management the solution that best meets the applicable legal and regulatory standards. The functions of the Risk and Compliance area shall be performed by the Risk and Compliance Director of Miradouro, or a partner and/or director elected as responsible for the responsibilities of the Risk and Compliance area ("Risk and Compliance Area").
c. information systems, routines, and procedures involved	Systems and resources provided by Refinitiv/LSEG and Comdinheiro are used. In addition, market information is gathered through newsletters and internal and external meetings. The Risk and Compliance Area will carry out the following activities and routines: (i) define, together with Management, the operational risks inherent to Miradouro's activities; (ii) issue and update policies and procedures; (iii) conduct employee training; (iv) ensure compliance with applicable laws; (v) clarify doubts regarding internal policies; (vi) issue opinions on internal precepts; (vii) investigate potential conflicts of interest; and (viii) receive and handle complaints.
d. how the company ensures the independence of the sector's work	Pursuant to internal policies (Code of Ethics and Compliance Manual), the Risk and Compliance Director must act independently in relation to her activities, with no subordination of such directorate to other areas of the company.

<b>8.10. Provide information on the structure maintained for risk management, including:</b>	
a. number of professionals	2
b. nature of activities carried out by its members	Risk analysis. Risk management at Miradouro is performed by the risk area, led by the Risk and Compliance Area. The risk area includes the Risk and Compliance Area and may also include risk analyst(s) hired by Miradouro. Risk management comprises monitoring operations and assets under Miradouro's management, with the objective of complying with Miradouro's Risk Management Policy, as well as addressing any need for portfolio realignment or correction. The risk area has full autonomy to challenge the execution of operations, not being subordinate to the management area.
c. information systems, routines, and procedures involved	Systems and resources provided by Refinitiv/LSEG and Comdinheiro are used. Additionally, market information is gathered through newsletters and internal and external meetings. The Risk and Compliance Area will carry out the activities described in item 8.9(c) above and additionally: (i) verify compliance with the Risk Management Policy; (ii) submit risk exposure reports for each portfolio; and (iii) diligently supervise any contracted third party hired for risk measurement.
d. how the company ensures the independence of the sector's work	Pursuant to internal policies (Code of Ethics and Compliance Manual), the Risk and Compliance Director must act independently, with no subordination to other areas of the company.
<b>8.11. Provide information on the structure maintained for treasury activities, asset control and processing, and share bookkeeping, including:</b>	
b. number of professionals	Not applicable.
c. information systems, routines, and procedures involved	
d. identification of a person responsible for the area and description of their experience in the activity	

<b>8.12. Provide information on the area responsible for distribution of investment fund shares, including:</b>	
a. number of professionals	02
b. nature of activities carried out by its members	Distribution of shares of investment funds under Miradouro's management.
c. training program for professionals involved in share distribution	For the purpose of informing and updating employees on Miradouro's internal policies and guidelines, all employees, including but not limited to those engaged in investment portfolio management activities, must participate in the periodic and occasional training sessions prepared by the Risk and Compliance Area. Training sessions will cover the analysis of all legislation and regulations pertaining to distribution activities, as well as best practices to be followed by employees.
d. available infrastructure, including a detailed list of equipment and services used in distribution	Miradouro Asset's hardware infrastructure includes: 6 Notebooks; 1 Desktop; 1 Printer; 2 Internet modems; 2 Routers; 1 UPS; and 1 Firewall.
e. information systems, routines, and procedures involved	Systems and resources provided by Refinitiv/LSEG and Comdinheiro are used. In addition, market information is gathered through newsletters and internal and external meetings.
8.13. Provide other information the company deems relevant	Not applicable.

<b>9. Company Compensation</b>	
<b>9.1. For each service provided or product managed, as described in item 6.1, indicate the main forms of compensation practiced</b>	
Indicate, exclusively in percentage terms of total revenue earned in the 36 (thirty-six) months prior to the base date of this form, the revenue from clients during the same period resulting from:	
a. fixed-base fees	0 (in the last 36 months) The pricing bands targeted by Miradouro will depend on the size of the Net Assets (NA) of each portfolio under management, with each portfolio being assigned to a specific band that will have an associated fixed-base fee (management fee). We currently expect that, at least initially, these management fees may range between 0.10% per year and 0.60% per year. Calculations will be based on the pro rata temporis equivalent rate for the respective billing periods.
b. performance fees	0 (in the last 36 months) We currently have no intention of charging a performance fee.
c. entry fees	0 (in the last 36 months) We currently have no intention of charging an entry fee.
d. exit fees	0 (in the last 36 months) We currently have no intention of charging an exit fee.
e. other fees	0 (in the last 36 months) We currently have no intention of charging other fees.
9.2. Provide other information the company deems relevant	Not applicable

10. Rules, procedures, and internal controls	
10.1. Describe the policy for selecting, hiring, and supervising service providers	<p>Miradouro maintains this third-party contracting policy for the performance of its activities. Pre-Contracting Procedures: For the purposes of third-party contracting, Miradouro's management area will provide a selection of service providers with unblemished integrity and reputation, selecting potential service providers based on price and quality criteria. Miradouro will require the contracted third party to complete the ANBIMA Due Diligence Questionnaire specific to the contracted activity when applicable. If no ANBIMA questionnaire exists for the activity, equivalent information will be required. For the purposes of this policy, Miradouro must consider the size of the contracted company, the volume of transactions, and the criticality of the activity. Post-Contracting Procedures: After contracting, the respective area with direct contact with the service provider will be responsible for ongoing supervision. Non-compliance will result in immediate reassessment. For securities brokers, the contracting criteria are: price and quality of services. Regarding additional services from brokers, Miradouro will maintain a notice on its website. Miradouro will observe Article 19 of the ANBIMA Code. Risk-Based Supervision for Contracted Third Parties: Service providers will be classified into three risk levels: 1) low; 2) medium; and 3) high. Supervision frequency: (i) every 12 months for low-risk; (ii) every 6 months for medium-risk; and (iii) monthly for high-risk. For providers not associated with ANBIMA, additional weekly monitoring will be required.</p>
10.2. Describe how securities transaction costs are monitored and minimized	<p>Miradouro will seek, in the order allocation process among brokers, an ideal balance between cost and service quality. There is no objective criterion for order distribution, and it will be carried out to maintain brokerage prices at market standard. Transaction costs are constantly monitored based on market price tracking and price checks with service providers. If significant discrepancy is identified, Miradouro will seek new service providers.</p>
10.3. Describe the rules for handling soft dollars, such as receipt of gifts, courses, travel, etc.	<p>Employees must not, directly or indirectly, request, accept, or agree to money, benefits, entertainment, favors, gifts, promises, or other advantages that may influence their functions. Gifts, meals, or benefits may be accepted without prior authorization in: (i) meals of modest value; (ii) promotional material up to R\$ 150.00; (iii) any gift or benefit up to R\$ 150.00; (iv) family or personal gifts not related to professional duties. Otherwise, prior authorization from Risk and Compliance is required. Soft Dollar: Non-monetary benefits from brokers for directing transactions. Must not be monetary and must be used exclusively for investment decision-making. Suppliers must not be selected solely based on Soft Dollar benefits. Miradouro must: (i) prioritize client interests; (ii) assess reasonableness of amounts in good faith; (iii) ensure benefits assist investment decisions; (iv) broadly disclose Soft Dollar practices; (v) fulfill loyalty and transparency duties; (vi) transfer any benefits to client portfolios. Arrangements must be in writing and records maintained. Soft Dollar must not include office expenses, travel, or entertainment. No exclusivity obligations created.</p>

<p>10.4. Describe the contingency, business continuity, and disaster recovery plans adopted</p>	<p>Miradouro adopts the following practices for maintenance and continuity of activities: a) Miradouro has remote access to email via Microsoft, which has its own contingency plans. b) Miradouro uses UPS devices throughout its hardware structure, enabling continuity for a period and orderly shutdown in case of power outage, except for printers, air conditioning, and general appliances. c) Miradouro provides its employees with laptops in case of prolonged power outages where UPS devices are insufficient. d) Miradouro has redundant internet providers to maintain availability and operations in case of unavailability of one provider. In addition, Miradouro has a cloud storage system with backups, periodically stored in secure locations off-site to preserve information in case of a disaster at Miradouro's headquarters.</p>
<p>10.5. Describe the policies, practices, and internal controls for liquidity risk management of securities portfolios</p>	<p>Miradouro uses information from renowned market institutions and software from accredited partners, together with the human assessment of the Risk and Compliance team, to determine liquidity criteria for assets, as described in its Liquidity Manual. The Risk and Compliance team is responsible for monitoring asset and liability liquidity risk. Monitoring methodology is described in policy sections, and any breaches are communicated to the Asset Management team. Miradouro has a Liquidity Risk Committee meeting monthly. In case of a tie, the Risk and Compliance Director casts the deciding vote. Asset liquidity is calculated based on average market volume with specific methodology per type. Liabilities consider the ANBIMA redemption probability matrix. In special illiquidity situations, procedures include: (i) immediate portfolio adjustment; (ii) gradual portfolio adjustment; and (iii) closing the portfolio for subscriptions/redemptions and convening unit holders.</p>
<p>10.6. Describe the policies, practices, and internal controls for compliance with the specific standards referred to in item I of art. 33 of CVM Resolution No. 21, if it decides to engage in the distribution of investment fund shares for which it is the manager or administrator</p>	<p>Not applicable.</p>
<p>10.7. Address of the manager's page on the internet where the documents required by art. 16 of CVM Resolution No. 21 can be found</p>	<p><a href="https://www.miradouroasset.com.br/">https://www.miradouroasset.com.br/</a></p>

<b>11. Contingencies</b>	
11.1. Describe judicial, administrative, or arbitral proceedings, not subject to confidentiality, in which the company is the defendant, that are relevant to the company's business, indicating:	No proceedings.
a. main facts	
b. amounts, assets, or rights involved	
11.2. Describe judicial, administrative, or arbitral proceedings, not subject to confidentiality, in which the director responsible for securities portfolio management is the defendant and which affect their professional reputation, indicating:	No proceedings.
a. main facts	
b. amounts, assets, or rights involved	
11.3. Describe other relevant contingencies not covered by the previous items	None.
11.4. Describe judicial, administrative, or arbitral convictions, with final and unappealable judgment, handed down in the last 5 (five) years in proceedings not subject to confidentiality in which the company was the defendant, indicating:	None.
a. main facts	
b. amounts, assets, or rights involved	
11.5. Describe judicial, administrative, or arbitral convictions, with final and unappealable judgment, handed down in the last 5 (five) years in proceedings not subject to confidentiality in which the director responsible for securities portfolio management was the defendant and which affected their business or professional reputation, indicating:	None.
c. main facts	
d. amounts, assets, or rights involved	

**12. Additional declarations of the director responsible for management, reporting on:**

a. accusations arising from administrative proceedings, as well as penalties suffered in the last 5 (five) years as a result of activities subject to the control and supervision of the CVM, the Central Bank of Brazil, the Private Insurance Superintendency – SUSEP, or the National Supplementary Pension Superintendency – PREVIC, including that they are not disqualified or suspended from holding positions in financial institutions and other entities authorized to operate by the aforementioned bodies

b. convictions for crimes of fraudulent insolvency, malfeasance, bribery, embezzlement, misappropriation, money laundering or concealment of assets, rights, and values, against the popular economy, the economic order, consumer relations, public faith, or public property, the national financial system, or criminal penalties that prohibit, even temporarily, access to public positions, by final and unappealable decision, subject to rehabilitation

c. impediments to managing or disposing of their assets by judicial and administrative decision

d. inclusion in credit protection service records

e. inclusion in the list of defaulting clients of an organized market administrator

f. protested bills against them

**DECLARATION**

I, **DIMAS GUILHERME DE CAMPOS FUNGHI**, Brazilian, businessman, married, enrolled in the CPF/MF under No. 099.997.866-77, holder of identity document MG-15.875.722 SSP MG, domiciled at Rua General Dionísio Cerqueira, No. 347, Apt. 402, Gutierrez neighborhood, Municipality of Belo Horizonte, State of Minas Gerais, ZIP Code: 30.441-063, hereby declare that:

a. I have no accusations against me arising from administrative proceedings, nor penalties suffered in the last 5 (five) years as a result of activities subject to the control and supervision of the CVM, the Central Bank of Brazil, SUSEP, or PREVIC, and I am not disqualified or suspended from holding positions in financial institutions and other entities authorized to operate by the aforementioned bodies;

b. I have no convictions against me for crimes of fraudulent insolvency, malfeasance, bribery, embezzlement, misappropriation, money laundering or concealment of assets, rights, and values, against the popular economy, the economic order, consumer relations, public faith, or public property, the national financial system, or criminal penalties that prohibit, even temporarily, access to public positions, by final and unappealable decision, subject to rehabilitation;

c. I have no impediments against me to manage or dispose of my assets by judicial and administrative decision;

d. I am not included in credit protection service records;

e. I am not included in the list of defaulting clients of an organized market administrator; and

f. There are no protested bills against me.

São Paulo, February 7, 2025.

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**DIMAS GUILHERME DE CAMPOS FUNGHI**