

	Policy	Code	POL 009
	Social Investment Policy	Area	Social Responsibility
		Duration until	01/10/2028
		Classification	Public

1. OBJECTIVES

1.1. POL 009 - Social Investment Policy aims to guide and assist the performance of Motiva Infraestrutura de Mobilidade S.A. ("Motiva" or "Company") and its Subsidiaries in the relationship with Brazilian society through Private Social Investment (ISP).

1.2. To promote the objective described in item 1.1., this Policy provides guidelines for the Social Investment strategy carried out by Motiva and its Subsidiaries in the resources managed by the Institute, in addition to presenting guidelines for approving the financing of social projects that strengthen the current strategy, in order to materialize its contribution to the prosperity of the planet, people and businesses.

2. APPLICATION

2.1. The provisions of this Policy apply to Motiva (including, for the purposes of this Policy, the Institute and its Subsidiaries), as well as to their respective Managers, Fiscal Councilors and Employees.

2.2. Motiva will make its best efforts to ensure that this Policy is observed by the Subsidiaries in which Motiva holds total and partial control.

2.3. This Policy shall be interpreted in accordance with the provisions contained in all legal provisions, bylaws, instructions, shareholders' agreement, among other documents related to Motiva's management.

2.4. NOR 032 – Donations and Sponsorships Standard establishes and details the criteria and responsibilities for Donations and Sponsorships, guiding their correct execution and disciplining the respective processes and controls, including financial authorities, risk and integrity assessment, and reporting to Management.

Sole Paragraph. For purposes of better understanding and uniformity in application, the specific terms used throughout this Policy, when beginning with a capital letter, are defined in the item "Definitions", at the end of this document.

2.5. Motiva will make its best efforts to ensure that this Policy is observed by the Subsidiaries in which it holds shared control.

3. REFERENCES

3.1. This Policy was developed based on the following documents:

- Motiva's Code of Ethical Conduct;
- POL 001 – Clean Company Policy and Combating Corruption and Bribery;

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- POL 002 – Policy for Transactions with Related Parties;
- POL 003 – Affiliation Management Policy for Unions, Associations, Class Entities and the Like;
- POL 010 – Consequence Management and Non-Retaliation Policy;
- NOR 005 – Human Rights, Diversity and Inclusion Standard;
- NOR 016 – Standard of Monitoring Procedures;
- NOR 018 – Conflict of Interest Rule;
- NOR 022 - Standard for the Disposal of Milled Material;
- NOR 032 – Donations and Sponsorships Standard
- Applicable Anti-Corruption Laws; e
- Governing Law.

4. SCOPE

4.1. The Institute's activities are primarily concentrated in the territories where Motiva operates, which is available at the website <https://www.motiva.com.br/>

4.2. The responsibilities, decision-making bodies and control mechanisms follow the provisions of Motiva's Bylaws and the Institute's Bylaws. Motiva ensures traceability in the decision-making process and the deliberation of actions, according to the competent forums specified in its governance according to NOR 032 – Donations and Sponsorships Standard.

5. PERFORMANCE

5.1. It is incumbent upon Motiva's Board of Directors to approve the Mission, Vision and Strategic Focuses and their updates.

5.2. The Institute centralizes the curatorship, selection, decision-making, management and continuous monitoring of the execution of a social nature for support, campaigns, donations, partnerships and sponsorships, except in relation to the actions provided for in the concession contracts of its Business Platforms and/or in Cooperation Agreements of the Business Platforms. In both cases, the proposals are previously evaluated by the Compliance area and with legal formalization.

5.3. It is incumbent upon the Institute to ensure the application of this Policy and conduct its respective revisions, with the support of the Corporate Governance and Compliance areas, and it is the responsibility of Motiva's Board of Directors to approve their respective revisions.

5.4. Periodically, the Institute's Board of Directors defines the territories to be prioritized, based on criteria such as relevance to the business, the cause and the territory.

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5.5. The purpose of the Institute is aligned with Motiva's purpose of "improving people's lives through mobility".

5.6. The Institute's mission is to induce the development of inclusive, resilient and sustainable cities in Brazil, through the mobilization of partnerships for sustainable development (specifically SDG 17 - partnerships and means of implementation).

5.7. Its operation takes place, primarily, through support for third-party projects and/or development of proprietary programs that are aligned with the defined Strategic Focuses, namely:

- a) Sustainable solutions | SDG 11 "Sustainable Communities and Cities" - promotion of solutions that support the development of more resilient and sustainable cities from the causes of nature-based solutions and sustainable mobility;
- b) Quality of life | SDG 3 "Health and well-being" - promotion of health and sport initiatives to promote social inclusion and improve people's quality of life;
- c) Reduction of inequalities | SDG 4 "Quality education" - democratization of access to opportunities from projects aimed at promoting culture, specifically in the areas of music, with support for orchestras; visual arts, with support for museums and/or exhibitions and literature, with support for literary fairs; and education, with a focus on actions aimed at basic and vocational education.

5.8. There are three types of projects that coexist and complement each other:

- a) Local development in the territories (urban acupuncture) - development or support for own and/or third-party projects that have a catalyzing character for transformations in priority territories to promote social license to operate;
- b) Coalition - creation and promotion of coalitions and strategic partnerships to unlock and add resources to promote social, cultural and environmental strengthening in a broad way in the territories or the development of the supported causes;
- c) Reputation and influence on the cause - development and direct support for own and third-party projects that have national and/or local relevance in the territories of operation, with the capacity for wide scope and reach, generation of reputational impact and/or production of knowledge to influence the supported causes.

Each of the project natures has preponderant impact characteristics, and, depending on the complexity, the same project can be classified into more than one nature.

5.9. The action in the territories is specifically based on SDG 17 "Partnerships and means of implementation" and considers the establishment of strategic partnerships and the mobilization of resources that allow expanding and diversifying the sources for social investment, mitigating risks of

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concentration and discontinuity of the actions developed, contributing to institutional sustainability and expanding local socio-environmental transformation.

5.10. The Institute manages Motiva's Volunteer Program, which aims to encourage employee engagement in social initiatives in the regions where Motiva operates, promoting a positive impact on society. Volunteer actions are tracked with transparency through the Volunteer Program System, with the following infrastructure:

(i) Structuring of Activities - The Institute develops and publishes annually on the <https://programadevoluntariado.motiva.com.br> website a portfolio of volunteer activities in hybrid, virtual and face-to-face formats. These activities are aligned with the Institute's strategic focuses, promoting engagement in social transformation.

(ii) Infrastructure for Volunteering Actions – The Institute evaluates and coordinates the provision of infrastructure necessary to carry out corporate volunteering actions, including, but not limited to, food, t-shirts, transportation and other items, according to the budget approved in the competent forum.

(iii) Management and Monitoring – The Institute manages the indicators of Corporate Volunteering through an electronic system, ensuring the freedom of choice of employees.

(iv) Transparency and Accountability – The Institute discloses the indicators of Corporate Volunteering annually through the Institute's Annual Activity Report, ensuring transparency of the initiatives.

5.11. The Institute monitors indicators of all social projects carried out, supported and/or sponsored and their effectiveness in terms of the intended social impact. All projects supported and/or developed by the Institute must produce and report reports on the Donations and Sponsorships Portal (<https://doacoesepatrocinius.motiva.com.br/>) containing, among other information:

- a) Number of people served directly or indirectly;
- b) Photographic records, evidencing the execution of the project;
- c) Cities and/or communities directly or indirectly impacted by the actions developed;
- d) Human and financial resources used - incentivized and non-incentivized;
- e) Earned media returns;
- (f) Regular visits;
- g) Research on qualitative aspects with the beneficiaries.

6. PROJECT SELECTION PROCESS

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6.1. Requests for support, campaigns, donations, partnerships, and sponsorships must be registered on Motiva's Donations and Sponsorships Portal, available on the Institute's website: <https://www.motiva.com.br/instituto/>

6.2. The registration of proposals in the system ensures traceability and transparency throughout the decision-making process, in addition to the monitoring of the resources invested, whether material, technical or financial – by Motiva and its Subsidiaries.

6.3. Projects are periodically evaluated based on criteria such as:

- a) Geographic focus - action in the Institute's priority territories or on a national scale, with an impact on the promotion of sustainable communities and cities.
- b) Strategic alignment - adherence to at least one of the Institute's strategic focuses.
- c) Capacity for achievement and sustainability - solid planning and feasibility compatible with the proposed objectives.
- d) Reputation - potential to strengthen and expand knowledge about the cause and reputation of the business.
- e) Social impact - direct or indirect contribution to the supported causes.
- f) Synergy with the business - possibility of activation and/or integration with Motiva initiatives.

In addition to the above criteria, all projects are evaluated from the perspective of Compliance, observing issues such as: legal compliance, suitability and adherence to the Company's policies.

6.4. In addition to the criteria described above, all projects supported and promoted by the Institute and actions related to Motiva's Social Responsibility consider the following premises:

- a) They are made transparently, ethically, in good faith and always in a way that respects the applicable laws;
- b) Carried out voluntarily and aiming at the public interest with the allocation of financial resources, in a planned, monitored and systematic manner, including sponsorship of incentivized and non-incentivized projects, Campaigns, Proprietary Programs and other projects with partners;
- c) They contribute positively to collective agendas and the socio-environmental conditions of the impacted communities. They must be aligned with the Institute's performance and with the UN Sustainable Development Goals (SDGs), reinforcing Motiva's leadership in sustainability;
- d) Value the protagonism of the communities where they are held, promoting means of engagement and participation, and ensuring appropriate communication channels with the community.

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e) Locally connect Motiva's business, supporting the construction of the social license to operate;

f) Contribute to the protection of Human Rights and promote Diversity and Inclusion;

g) Prioritize initiatives with greater social impact and relevance in the territory, prioritizing the non-dispersion of social investment;

h) Maximize social and environmental impact, whenever possible by connecting with Motiva's businesses and creating volunteer opportunities;

i) Allow, whenever possible, articulation with civil society entities and other Motiva stakeholders, in addition to promoting participation in business forums that allow connecting Motiva with other companies to act on behalf of the local community, provided that they are internally approved in a competent forum.

6.5. Motiva does not support any initiatives related to campaigns, donations or sponsorships:

Not aligned with the current strategy:

(i) High-performance sports projects and development of professional athletes;

(ii) Cultural projects in the areas of performing arts (dance, theater, circus and opera), audiovisual (production of films, documentaries and series);

(iii) Education projects aimed at higher education and research in education.

Or that the Company is prohibited from:

(i) Political parties, political campaigns and/or candidates for political office, with Motiva resources, in accordance with the legislation in force;

(ii) Individuals, including Public Agents and PEPs;

(iii) Legal entity with the purpose of (a) influencing, directly or indirectly, or being considered influential in a business decision of Motiva or (b) to provide or obtain Undue Advantage;

(iv) Religious institutions or events of a religious nature;

(v) Events organized by people or institutions with objectives incompatible with Motiva's business principles or that may damage its reputation;

(vi) With payment in cash or by deposit in bank accounts held separately from the beneficiary, including the amounts in banknotes from lost and found;

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(vii) Any bodies or entities of the Public Administration, except for cooperation agreements, Partnerships, Agreements or Partnerships with a Public entity, projects of interest to society, provided that they are aligned with the guidelines for donations and sponsorships, and deliberated internally by the competent governance forum;

(viii) Legal entity controlled, directly or indirectly, by PEP or Public Agent;

(ix) Legal entity (or that has partners and/or managers) convicted of the practice of unlawful acts related to corruption, fraud and/or money laundering;

(x) Carried out by third parties on behalf of Motiva;

(xi) Benefit of Administrators, Employees, Board Members or Fiscal Councilors and managers, such as legal entities in which the Administrators, Board Members or Fiscal Councilors and managers have some type of management, decision, influence or equity interest, among other situations that qualify as undue benefit or conflict of interest with management and/or decision-making power; as well as donations and sponsorships indicated by Directors and Board Members of Motiva and/or Institute;

(xii) Initiatives that may be associated with any risk to life or the environment;

(xiii) Initiatives that express transgression, restriction or that corroborate prejudice, social, racial, gender, sexual orientation or any other kind of discrimination against any type of group;

(xiv) Initiatives that encourage the consumption of alcoholic beverages, licit and illicit drugs;

(xv) Initiatives that bring any risk of violation of Human Rights;

(xvi) Institutions that have been judged unfit or that are prevented from contracting with public institutions;

(xvii) Legal entities with bankruptcy decreed or under judicial reorganization;

(xviii) Legal entities or whose members are linked to criminal organizations, to the arms and ammunition market;

(xix) Legal entities included in lists, documents and/or official reports of deforestation; e

(xx) Trade unions.

6.6. The monitoring and communication about the selection and evaluation process of the submitted projects can be accessed on the Donations and Sponsorships Portal and/or through notifications via e-mail. For further clarification, the Institute provides the e-mail: instituto@motiva.com.br.

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7. COMMUNICATION AND DISSEMINATION OF SOCIAL INVESTMENT

7.1. The Company discloses its actions and results obtained to its internal and external stakeholders through the Institute's Annual Activity Report and Motiva's Integrated Report, available on the <https://www.motiva.com.br/> website

8. FINAL PROVISIONS

8.1. Failure to comply with the provisions of this Policy will subject Managers and Employees to the appropriate disciplinary actions under the terms of Motiva's "POL 010 - Consequence Management and Non-Retaliation Policy", without prejudice to other applicable legal measures.

8.2. In addition, Motiva encourages its Employees or Managers, as well as any Third Parties, whenever they know or have indications of non-compliance with the Company's policies and rules or laws in force in the country, to register occurrences through the following channels:

Web: <https://canalconfidencial.com.br/canalconfidencialMotiva/> | Phone: 0800 721 0759

9. DEFINITIONS

The technical or specific terms used in this Policy when beginning with a capital letter, singular or plural, masculine or feminine, are defined below in order to facilitate the understanding and correct application of the content of this document:

"Urban acupuncture" is a planning approach that focuses on strategic and punctual interventions to generate a positive impact on a large scale. It consists of identifying critical points in the territory and vulnerable communities and applying effective solutions to improve the quality of life, with a positive social, environmental and economic impact in cities.

"Managers" are the statutory officers and members of the Board of Directors of Motiva or its Subsidiaries.

"Public Administration" encompasses any entities that are part of the direct or indirect, national or international public administration, including the Union, the States, the Municipalities and the Federal District, as well as their bodies, ministries, secretariats, areas, subsecretariats, autarchies, companies, institutions, agencies and bodies owned or controlled by the public administration and other public entities.

"Public Officials" is anyone who exercises, even if temporarily or without remuneration, by election, appointment, designation, hiring or any form of investiture or bond, mandate, position, employment

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or function in government bodies, companies that are part of the direct or indirect public administration, including regulatory agencies, legislative, executive or judicial powers, in any country.

"Association" is the non-profit entity resulting from the gathering of people for the achievement of a common goal.

"Volunteer Actions" are unpaid and optional activities, suggested and/or mobilized by the Institute and chosen by the Employee with the objective of contributing to the development of the community linked to the Employee's personal values and purpose.

"Campaigns" are institutional campaigns that aim to promote solidarity, engagement and volunteering, support for causes aimed at mobilizing diverse audiences on topics relevant to society, in addition to environmental and behavioral awareness actions and encouraging collective thinking in favor of sustainable development in the vulnerable territories identified by the Institute. These are public interest campaigns in which there is no collection and/or donation to any third party involved.

"Coalition" mobilization and orchestration of partnerships with a territorial (or thematic) focus of great potential for social transformation. These are strategic agreements and partnerships between sectors (public, private and third sector), uniting organizations that share a common goal and join forces to achieve it. In the context of this policy, these are temporary coalitions to drive change, influence policies and/or strengthen collective initiatives in a given territory of operation.

"Employees" are all employees, including the non-statutory officers of Motiva and its Subsidiaries.

"Compliance" are practices and behaviors aligned with standards and laws in order to permeate ethics and integrity throughout Motiva, regardless of position or function.

"Conflict of Interest" occurs whenever the private interest of the Administrator or Employee interferes, or may interfere, in any way, directly or indirectly, in their judgment and objectivity, to the detriment of Motiva's interests, and may affect their ability to perform their activities or decide with impartiality, impartiality or independence.

"Subsidiary" is any company in which Motiva holds shareholder rights that ensure it, individually or through a voting agreement, and on a permanent basis, preponderance in corporate resolutions and the power to elect the majority of managers.

"CSC" is Motiva's Shared Services Center.

"Donation" is any act in which an individual or legal entity, out of liberality, transfers something (money, provision of services, goods or various advantages) of any value of its assets to another, which accepts them.

"Private Social Investment" is the voluntary and systematic transfer of resources, in a planned and monitored manner, to social projects of public interest.

"Institute" is a private, non-profit or economic organization, created with the objective of encouraging and promoting activities, programs, events and social projects of public interest, at the discretion of Motiva, in a planned, monitored and systematic manner, contributing to the management of the Company's social investment in the communities in which Motiva is present.

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"Applicable Anti-Corruption Laws" means all applicable national and international anti-corruption laws and regulations, especially Law No. 12,846/2013 and Decree Law No. 8,420/2013, FCPA – Foreign Corrupt Practices Act, the Administrative Improbity Law (Law No. 8,429/1992), the ABNT NBR ISO37001 standard, including, without limitation, the anti-bribery and anti-corruption laws of the countries where Motiva operates.

"Sustainable Development Goals or SDGs" are the 17 goals defined by the UN that address the main development challenges faced by people in Brazil and around the world.

"Sponsorship" is any transfer or contribution, pecuniary or not (services or materials), made by Motiva or its Subsidiaries to an event organized by Third Parties, in exchange for counterparts that aim to add value to the brand, strengthen a concept, generate recognition or expand Motiva's relationship with its stakeholders and with society in general.

"PEP" are politically exposed persons, as well as their spouses, partners or relatives up to the third degree, and legal entities in which they participate.

"Business Platforms" are the different segments of Motiva's activity.

"Donations and Sponsorships Portal" or "Portal" is the system developed to receive proposals, follow up and monitor projects supported by Motiva and its Institute.

"Proprietary Programs" are its own programs subsidized with financial resources, with the objective of contributing to social development in the regions where Motiva operates.

"Reputation and influence on the cause" are projects of national and/or local relevance in the territories where they operate, with the capacity for a wide scope and reach, generation of reputational impact and/or production of knowledge to influence the supported causes.

"Incentivized Projects" are projects in which the allocation of financial resources is carried out with the use of tax incentives provided for by law, whose procedure can be conducted with or without a public notice.

"Territories" are spaces in which Motiva and its Subsidiaries operate where, in addition to the geographical delimitation, physical, social, cultural, economic and environmental factors that directly impact the quality of life of the population interact. For the purposes of this policy, territories are considered to be: cities, neighborhoods or communities where it is possible to identify both the available urban infrastructure and the social and cultural ties that shape a local identity.

"Priority territories" are territories established as priorities for Motiva's social investment.

"Undue Advantage" is an advantage or favor in any form that is not authorized by law or contract and/or that could not be obtained by lawful or integral means. It is an incentive or reward (which may be financial or non-financial) for a person to act or fail to act in accordance with the fulfillment of their duties. For the purposes of the Applicable Anti-Corruption Laws, examples of Undue Advantage are also the following: money, gifts, travel, entertainment, offers or promises of employment, meals, sponsorship of events, scholarships and charitable contributions without the proper authorizations or outside the guidelines allowed by Motiva to obtain any advantage.

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"Business Units" are the Subsidiaries and controlled internal divisions (branches with a specific purpose), including the SSC.

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