

# **POLICY FOR DISCLOSURE OF MATERIAL ACT OR FACT AND TRADING OF SECURITIES ISSUED BY SANEPAR**

## 1. GENERAL PROVISIONS

Review approved at the 12th Ordinary Meeting of the Board of Directors, held on December 19, 2024 (Version 2)

## 2. PURPOSE

The purpose of this Policy for Disclosure of Relevant Acts or Facts and for Trading Securities Issued by Companhia de Saneamento do Paraná – Sanepar ("Disclosure and Trading Policy" or "Policy") is to establish guidelines regarding the rules and practices which must be observed by all those who are aware of privileged information about a relevant act or fact related to the Company, pursuant to Resolution of the Brazilian Securities and Exchange Commission - CVM No. 44, dated August 23, 2021, as amended, aiming to curb the use of said information, for their own benefit or that of third parties, in trading securities issued by the Company and set out the guidelines that govern, in an orderly manner and within legal limits: (i) the disclosure of material information ("relevant act or fact"); (ii) the trading of securities pending material information not disclosed; and (iii) the disclosure of information on the trading of securities, in line with CVM rules and with the Company's internal policies, in order to avoid transgressions regarding the undue use of material information not disclosed to the public, aiming to inhibit the practice of insider trading and tipping, preserving the transparency and timely dissemination of information necessary for decisions on trading securities issued by Sanepar.

## 3. COVERAGE

The Company, its employees, related persons and/or persons who have access to information relating to a relevant act or fact are required to comply with the rules established in this "Disclosure and Trading Policy".

The rules hereof also apply to cases in which negotiations by related persons occur directly and/or indirectly for their own benefit or that of third parties, through the use, for example, of: (a) company controlled thereby, directly or indirectly; (b) spouses from whom they are not legally or extrajudicially separated, partners and any dependents included in their annual income tax adjustment statement.

Related persons, identified in CVM Resolution No. 44/2021, as well as those that the Company may specify, agree with said rules by signing the **Adhesion Agreement to the**

**Policy for Disclosure of Relevant Act or Fact and for Trading of Securities Issued by Sanepar** - Annex I and presentation of **Declaration of Securities** - Annex II, as defined in the same Resolution.

The list of people whose adherence to the "Disclosure and Trading Policy", as well as the respective terms of adherence, will be kept at the Company and available to CVM as long as the person maintains a relationship and for a minimum of five years after leaving the company.

#### **4. REFERENCES**

- Federal Law No. 6.385/1976 – Provides for the Securities Market;
- Federal Law No. 6.404/1976 – Brazilian Corporations Law;
- Federal Law No. 13.303/2016 – State Companies Law;
- CVM Resolution No. 44/2021 – Provides for the disclosure of information on a relevant act or fact, the trading of securities pending an undisclosed relevant act or fact, and the disclosure of information on the trading of securities;
- CVM Resolution No. 80/2022 – Provides for the registration and the provision of periodic and occasional information by issuers of securities admitted to trading on regulated securities markets;
- CVM Resolution No.160/2022 – Provides for public offerings of primary or secondary distribution of securities and the trading of the offered securities in regulated markets;
- Annual Circular Letter- CVM/SEP – General guidelines on procedures to be observed by publicly-held, foreign and incentivized companies;
- Regulation of B3 Corporate Governance Level 2;
- Sanepar's Bylaws;
- Related Parties and Conflict of Interest Policy;
- Disciplinary Regulations;
- Information Security Management System;
- Code of Conduct and Integrity;

This Policy must be interpreted together with CVM Resolution No. 44/2021 and other relevant legislation, with Sanepar's Code of Conduct and Integrity and other corporate policies.

## 5. DEFINITIONS

Key terms referenced herein include:

- a) **Controlling Shareholders or Controller:** Shareholder or group of shareholders bound by a shareholder's agreement (voting agreement) or under common control that exercises control over Sanepar, pursuant to Article 116 of Law No. 6.404/1976;
- b) **Managers:** Officers and members of Sanepar's Board of Directors;
- c) **Relevant act or Fact:** It must be considered as "Relevant" in accordance with the provisions of Article 2 of CVM Resolution No. 44/2021: (i) any decision of the controlling shareholder(s); (ii) deliberation of the general meeting or the Company's management bodies; or (iii) any other act or fact of a political-administrative, technical, business or economic-financial nature that occurred or related to the Company's business, which may significantly influence any of the following hypotheses:
  - In the quotation of securities or in the securities related thereto;
  - In the decision of investors to buy, sell or hold securities or the securities related thereto; or
  - In the decision of investors to exercise any rights inherent to the condition of holder of the securities issued by Sanepar or the securities related thereto.

With the purpose of facilitating the recognition of situations that may potentially characterize a Relevant act or fact of a publicly-held company, CVM Resolution No. 44/2021 listed in the sole paragraph of Article 2, by way of example and, therefore, not exhaustively, examples of Relevant acts or facts;

- d) **B3:** It is Brazil's current stock exchange: B3 SA - Brasil, Bolsa, Balcão;
- e) **Stock Exchange:** Organized market for trading financial assets;
- f) **Company:** Companhia de Saneamento do Paraná – Sanepar;
- g) **Tax Advisors:** Members of Sanepar's Audit Committee;
- h) **Commercial, professional or trust relationships with Sanepar:** Such as independent auditors, securities analysts, consultants and other service providers;
- i) **CVM:** Securities Exchange Commission.
- j) **Investor Relations Officer:** At Sanepar, he/she is the Financial and Investor Relations Officer who, under the terms hereof, is responsible for the Company's relationship with the investing public, for providing information to the CVM in

accordance with Article 49 of CVM Resolution No. 80/2022 and the Stock Exchanges;

- k) **Market managing entities:** Entities in which securities issued by Sanepar are admitted to trading, in the country or abroad;
- l) **Former Managers:** Former officers and former directors, who cease to be part of Sanepar's management;
- m) **Privileged information or Relevant information:** All relevant information related to the Company capable of significantly influencing the quotation or the decision to buy, sell or hold the Securities and not yet disclosed;
- n) **Insiders:** Controlling shareholder, executives, employees and any other persons with access to material information not yet disclosed;
- o) **Insider trading:** Misuse of privileged information for their own benefit or that of third parties;
- p) **Direct negotiations:** Negotiations carried out by the holder of the security;
- q) **Indirect negotiations:** Those in which related persons and other linked persons, despite not conducting them on their behalf, have control and decision-making power over the negotiation;
- r) **Bodies with technical or advisory functions:** Statutory advisory bodies for administrators;
- s) **Related Persons:** Individual or legal entity, fund or universality of rights, which acts representing the same interest as the person or entity to which it is linked. At Sanepar, the controlling shareholder(s), direct or indirect, officers, members of the board of directors, of the audit committee and of any bodies with technical or advisory functions, created by statutory provision, or by whomever, in by virtue of his position, function or position in the Company, has access to information related to a relevant act or fact before its disclosure;
- t) **Linked persons:** (i) spouses not legally separated, (ii) partner or (iii) dependent included in the annual income tax return, and (iv) companies directly or indirectly controlled thereby, linked to related persons under the terms of CVM Resolution No. 44 /2021;
- u) **Investing public:** Shareholders, investors in securities, analysts and other capital market agents;
- v) **Associated Companies:** Companies over which Sanepar has significant influence in the management, without controlling them. There is a presumption of significant influence, under the terms of Law No. 6.404/76, the ownership of

20% (twenty percent) or more of the votes conferred by the capital of the investee, without controlling it;

- w) **Subsidiaries:** Companies that are directly or indirectly controlled by Sanepar. Where Sanepar acts as the holder of rights that permanently ensure significant influence in the direction of social activities and guide the operation of the bodies of the respective company, participate in political, financial or operational decisions, directly or indirectly, under factual or legal aspects;
- x) **Tipping:** Privileged Information Tips for third parties to benefit from them;
- y) **Securities:** Pursuant to Article 2 of Law No. 6.385/76: (i) shares, debentures and subscription warrants; (ii) the coupons, rights, subscription receipts and split certificates; (iii) securities deposit certificates; (iv) debenture notes; (v) the investment fund shares in securities or investment clubs in any assets; (vi) the commercial notes; (vii) futures, options and other derivative agreements, whose underlying assets are securities; (viii) other derivative agreements, regardless of the underlying assets; and (ix) when publicly offered, any other securities or collective investment agreements, which generate participation, partnership or compensation rights, including resulting from the provision of services, whose income comes from the effort of the entrepreneur or third parties.

## 6. GUIDELINES

### 6.1 Duties and Responsibilities in Disclosure of Relevant act or Fact

CVM Resolution No. 44/2021 assigns the Investor Relations Officer the primary responsibility for communicating and disclosing to the CVM any relevant act or fact that occurred in the Company's business, as well as the role of ensuring its wide and immediate dissemination, simultaneously in all markets where such securities are traded, preceding or concurrently with the dissemination of information in the media, press, class association meetings, investors, analysts or other audiences, in the country or abroad.

In order to ensure compliance with the duty to disclose within the scope of the CVM Resolution, the controlling shareholders, officers, administrators, tax advisors and, also, the members of any bodies with technical or advisory functions of the Company, have the duty to inform, in writing, to the Investor Relations Officer information about a relevant act or fact. In the event of omission by the Investor Relations Officer, it is also responsible for reporting directly to the CVM.

It is incumbent upon the Investor Relations Officer, in addition to providing information from Sanepar, to confirm, correct, clarify, amend or republish information on a relevant act or fact before the CVM, the stock exchange to the organized over-the-counter market entity, if applicable.

In the event of an atypical fluctuation in the quotation, price or traded quantity of the Company's securities or those related thereto, the Investor Relations Officer must inquire of people with access to relevant acts or facts, with the aim of ascertaining whether they are aware of information that must be disclosed to the market.

### **6.2 Procedures for Disclosure of Relevant act or Fact**

The disclosure of a relevant act or fact must occur, whenever possible, before the beginning or after the end of trading on the stock exchanges and entities of the organized over-the-counter market where the securities are admitted to trading, in the country or abroad, as the case may be. In case of incompatibility, the opening hours of the Brazilian market prevail.

In the case of an imperative need to disclose information during trading hours, the Investor Relations Officer must request, always simultaneously to national and foreign market management entities, the suspension of securities trading, for the time necessary for the adequate dissemination of relevant information, subject to the procedures established in the regulations of the aforementioned entities.

### **6.3 Immediate Disclosure Exception**

In view of its exceptional nature, the non-disclosure of a relevant act or fact related to Sanepar must be the subject of a decision by the controlling shareholders or the Company's managers in the understanding that Sanepar's legitimate interests will be put at risk in view of its exposure. However, they are bound to immediate disclosure if the information escapes control, as well as, in the verification of atypical oscillation in the quote, price or traded quantity of the securities issued by Sanepar or referenced thereto.

In the event of exceptionality of disclosure and in the light of the circumstances, the Investor Relations Officer, or even the managers or any shareholder, must submit to the CVM the decision to maintain secrecy regarding a Relevant act or fact, through a confidentiality request addressed to the Superintendence of Relations with Companies – SEP pursuant to the First Paragraph of Article 7 of CVM Resolution No. 44/2021, with the CVM deciding to disclose the relevant act or fact.



#### **6.4 Means and Form of Disclosure**

The disclosure of a relevant act or fact involving Sanepar must be published in: (i) at least one news portal with a page on the World Wide Web, indicated in the Company's Registration Form; (ii) available on Sanepar's Investor Relations website and; (iii) at the discretion of the manager of this "Policy", it may additionally be published in the major newspapers used by the Company, also informed in Sanepar's Registration Form.

Sanepar may, at each disclosure of a relevant act or fact, choose to carry it out in a summarized form at the aforementioned addresses, but in this case, it must be indicated in the post the address(es) on the Internet where complete information must be available to all investors, in content at least identical to that sent to the CVM.

The information disclosed by means of a relevant act or fact must be carried out in a clear and precise manner, in language accessible to the investing public.

#### **6.5 Duty of Confidentiality**

Controlling shareholders, administrators, tax advisors, members of any bodies with technical or advisory functions, created by statutory provision and employees with access to relevant information to which they have privileged access, depending on the office or position they occupy in the Company, have the duty to (i) keep the aforementioned information confidential until it is disclosed to the market, as well as (ii) ensure that subordinates and trusted third parties also do so, jointly responding with them in the event of non-compliance.

Thus, for guidance purposes, whenever there is doubt about the relevance of privileged information, one should contact Sanepar's Investor Relations Officer in order to resolve the doubt.

#### **6.6 Disclosure of Information on Trading by Administrators and Other Related Persons and Linked Persons**

Pursuant to Article 11 and items of CVM Resolution No. 44/2021, officers, members of the board of directors, the audit committee and any bodies with technical or advisory functions created by statutory provision, are obliged to inform the Company of the ownership and the negotiations carried out with securities issued by the Company itself, by its controlling or controlled companies, in the latter two cases, provided that they are publicly-held companies. They must also indicate the securities that are owned by persons connected thereto: (i) spouses not legally separated, (ii) partner or (iii)



dependent included in the annual income tax return, and (iv) companies directly or indirectly controlled thereby;

Said information must be forwarded within 5 (five) days after the completion of each transaction or on the first business day after taking office, containing at least the following: (i) name and qualification of the communicant, and, if applicable, of the connected persons, indicating the registration number in the Corporate or Individual Taxpayer Registry; (ii) quantity, by type and class, in the case of shares, and other characteristics in the case of other securities, in addition to identifying the issuing company and the balance of the position held before and after trading; and (iii) form of acquisition or disposal, price and date of transactions.

Any changes must be informed within a period of up to 15 (fifteen) days from event.

The information provided is sent to the CVM and, if applicable, to the management entities of the markets in which the Company's shares are admitted to trading.

Trading by the controlling shareholder must be disclosed pursuant to Article 12 of CVM Resolution No. 44/2021 listed in item 6.9 hereof.

#### **6.7 Prohibitions on Negotiation and Presumption of Use of Privileged Information**

It is prohibited to trade securities issued by the Company, provide advice or investment assistance, by the Company itself or by related persons or by any person who has access to information related to the relevant act or fact, from the date on which they become aware of the information until its disclosure to the market, pursuant to CVM Resolution No. 44/2021.

Regardless of the determination of the Investor Relations Officer, the aforementioned people are prohibited from trading securities:

(a) in the period of 15 (fifteen) days prior to the date of disclosure of the Company's quarterly information and annual statements plus the day of disclosure .

It should be noted that, in accordance with Article 14 of CVM Resolution No. 44/2021, the Company, the controlling shareholders, officers, members of the board of directors and the audit committee are prohibited from carrying out any negotiation, regardless of whether they become aware of the content of the quarterly accounting information and annual financial statements or of relevant information pending disclosure.

(b) from the moment they have access to the information, even if they are initial studies, until the publication of the respective public notices and/or announcements or newsletters regarding the intention to: (i) to promote incorporation, total or partial spin-off, merger, transformation; corporate reorganization or business combination; (ii) in the execution, alteration or termination of any agreement or contract aiming at the transfer of the respective share control, or if an option or power of attorney has been granted for the same purpose; (iii) to cancel the registration as a publicly-held company, change the environment or share trading segment; (iv) request for judicial or extrajudicial reorganization and bankruptcy; (v) distribute dividends and/or interest on equity, share bonuses or their derivatives or split; (vi) in carrying out a public offering for the distribution of securities pursuant to CVM Resolution No.160/2022, as amended.

Pursuant to Article 13, of CVM Resolution No. 44/2021, it is presumed that direct or indirect controlling shareholders, officers, administrators, members of the audit committee and the Company itself have access to all relevant information not yet disclosed. In addition to these, it is assumed that all those who have a commercial, professional or trust relationship with Sanepar, when having access to relevant information not yet disclosed, know that it is privileged information, except for the negotiations established in the Third Paragraph of the Article 14 of CVM Resolution No. 44/2021.

It is important to emphasize that the presumption reaches the person who trades securities with relevant information that has not yet been disclosed, as if the information had been used, characterizing the unlawful act.

In addition to the aforementioned observations, related persons must ensure that those with whom they have a business, professional or trust relationship do not trade securities when they have access to privileged information. To this end, do its best so that everyone who accesses material information observes and agrees with the Policy for Disclosure of Relevant Act and Fact and for Trading Securities Issued by Sanepar through the Adhesion Agreement.

The Investor Relations Officer may establish periods for prohibiting trading in securities in addition to those provided for in this "Disclosure and Trading Policy", and shall immediately notify the related persons. The Investor Relations Officer is not obliged to justify the decision to determine the blocking period, which will be treated confidentially by its addressees.

Related persons who leave the Company prior to the disclosure of a relevant act or fact arising during their management period will not be able to trade securities issued by Sanepar from the date on which they become aware of the relevant act or fact until the earliest between (i) the date of its disclosure to the market by the Company and (ii) 3 (three) months after its removal.

#### **6.8 Authorization for Trading Securities, via Investment Plan**

All people who have a relationship with the Company and who may be subject to the presumptions indicated in CVM Resolution No. 44/2021 may trade the shares issued by the Company, in accordance with the investment or disinvestment plan approved by the Company and individually signed, regulating their negotiations in the prohibited periods provided that the plan:

- (a) Be formalized in writing before the Investor Relations Officer;
- (b) Be verifiable from its institution and content changes;
- (c) Establish irrevocably and irreversibly the dates or events and the amounts or quantities of the business to be carried out;
- (d) Provide for a minimum period of 3 (three) months for the plan itself, any modifications and cancellation to take effect;
- (e) The Company has approved a schedule defining specific dates for the disclosure of quarterly accounting information and annual financial statements;
- (f) Oblige its participant to revert to the Company any losses avoided or potential gains obtained in negotiations with securities issued by the Company, resulting from any change in the dates of disclosure of the accounting information and annual financial statements, calculated using reasonable criteria and subject to verification defined by the plan. The impossibility of adhering to the plan pending a relevant fact not disclosed to the market, and during the prohibited period prior to the disclosure of accounting information and annual financial statements.

Formalized individual investment and disinvestment programs must: (i) have a minimum duration of 6 (six) months; (ii) be filed with the Investor Relations Office. (iii) follow the rules established in this "Disclosure and Trading Policy."

The individual programs mentioned above will only be approved by the Company if their content prevents the use of privileged information for the participant's own benefit, direct or indirect, and therefore must be prepared in such a way that the purchase or sale decision cannot be taken after knowledge of privileged information, the person holding

the program refraining from exerting influence over the operation pending an undisclosed relevant act or fact.

It is up to the Board of Directors, or another statutory body defined by the Board of Directors, to verify, at least every six months, the adherence to the negotiations carried out in accordance with the established plans.

#### **6.9 Disclosure of Information on Acquisition and Disposal of Relevant Equity Interest and Controlling Shareholder**

A relevant transaction is considered to be the business or set of businesses through which the direct or indirect participation of the controlling shareholders and those who elect members of the board of directors and the audit committee, as well as a person or group of people representing the same interest exceeds, for more or for less, the levels of 5% (five percent), 10% (ten percent), 15% (fifteen percent), and so on, of type or class of shares representing the share capital of the Company, undertake to inform/send Sanepar immediate communication containing all the information provided for in Article 12 and items of CVM Resolution No. 44/2021, also considering the rules established in the following paragraphs of the same article.

These obligations extend to all securities issued by the Company or referenced thereto.

The acquisitions that aim to change the composition of the control or the administrative structure of the Company or that generate the obligation to carry out a public offering, the acquirer must promote the disclosure, at least, through the same disclosure channels adopted by Sanepar, in accordance with the item "6.4 Means and Forms of Disclosure", hereof.

The statement about the scope, acquisition or disposal of relevant shareholding must be forwarded to the CVM immediately after the relevant shareholding is achieved and, if applicable, the managing entities of the markets in which the company's shares are admitted to trading.

#### **6.10 Disclosure of Information on Disposal of Control**

The Acquirer of the Company's shareholding control must disclose a relevant fact, and carry out the communications foreseen in relation to the relevant acts or facts established in item "6.2 Duties and Responsibilities in the Disclosure of a Relevant Act or Fact" of this "Policy", contemplating, at least, the information requested in Article 10 of CVM Resolution No. 44/2021.

## **7. LIABILITIES**

Any violation of the provisions of this "Disclosure and Trading Policy" will be subject to the procedures and penalties provided for by law and, when applicable, in Sanepar's Disciplinary Regulations, in addition to liability for damages caused to the Company and/or third parties, observing:

- a) Fiduciary duties provided for in Law 6.404/1976 against the Administrators, notably those related to loyalty, care and diligence towards the Company and its business extended, under the terms hereof, to other related persons;
- b) Third Party Responsibility: The provisions of this "Disclosure and Trading Policy" do not exclude the liability of third parties not directly linked to the Company who have access to a Relevant act or fact.

## **8. PENALTIES**

Serious violations, under the terms of the Third Paragraph of Article 11 of Law No. 6.385/76, are violations of the provisions of CVM Resolution No. 44/2021 which, together with other relevant legislation, guides this policy.

Applicable penalties include, briefly: (i) warnings; (ii) fines; and (iii) temporary disqualification from exercising a position, practicing certain activities and operating in securities market operations.

When the violation hereof involves any person who is bound by Sanepar's Disciplinary Regulations, the Investor Relations Management - GRI or anyone who is aware of the fact must notify the Risks and Compliance Management - GGRC so that the procedures tending to the internal verification and eventual application of corresponding disciplinary measure are adopted.

## **9. ADDITIONAL GUIDELINES**

Any changes to the "Disclosure and Trading Policy" must be approved by the Company's Board of Directors, forwarding it to the CVM and, if applicable, to the managing entities of the markets in which the securities issued by the Company are admitted to negotiation, accompanied by a copy of the deliberation and the entire content of the documents that govern and integrate this policy.

The Policy for Disclosure and Trading of Securities Issued by Sanepar cannot be changed pending the disclosure of a relevant act or fact.

The unauthorized disclosure of privileged and not publicly disclosed information about Sanepar is harmful to the Company and is prohibited.

Related persons and those who come to acquire this quality are obliged to sign the Adhesion Agreement, in accordance with Annex I.

Related persons, pursuant to Article 11, of CVM Resolution No. 44/2021, in the case of shareholding, as well as negotiations that change it, are obliged to sign the Declaration, the model of which appears in Annex II, and must promptly forward them to the Investor Relations Board.

Any violations hereof must be immediately communicated to the Company, in the person of the Investor Relations Officer.

The Investor Relations Officer is responsible for executing and monitoring the terms of this "Disclosure and Trading Policy".

## **10. FINAL PROVISIONS**

Questions regarding the interpretation of this Policy should be forwarded to Sanepar's Investor Relation Management or Governance Management.

This policy enters into force on the date of its approval by the Board of Directors and is available at: [ri.sanepar.com.br](http://ri.sanepar.com.br)

## **11. ANNEXES**

The annexes indicated below are an integral part of **Policy for Disclosure of Relevant Act or Fact and Trading of Securities Issued by Sanepar**, and comprise other guidelines and procedures of Sanepar.

**ANNEX I – ADHESION AGREEMENT TO THE POLICY FOR DISCLOSURE OF A RELEVANT ACT OR FACT AND FOR TRADING SECURITIES ISSUED BY SANEPAR**

**ANNEX II - STATEMENT OF SECURITIES**

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## ANNEX I

### **ADHESION AGREEMENT TO THE POLICY FOR DISCLOSURE OF RELEVANT ACT OR FACT AND TRADING OF SECURITIES ISSUED BY SANEPAR**

I, [name], [CPF/CNPJ], [function/position], [address] hereby express my full awareness of, agreement with and adherence to the Disclosure Policy for Relevant Act or Fact and of Trading Securities Issued by Companhia de Saneamento do Paraná - SANEPAR, approved at the Board of Directors Meeting held on [day] of [month] of [year].

Curitiba, \_\_\_\_\_.

\_\_\_\_\_  
Signature



**ANNEX II****STATEMENT OF SECURITIES**

I, [name], [CPF/CNPJ], [function/position], in compliance with the provisions of CVM Resolution No. 44, of August 23, 2021, DECLARE that:

( ) I have,

( ) [name], [CPF/CNPJ] I had, pursuant to the Second Paragraph of Article 11 of CVM Resolution No. 44/2021, on this date (1st business day after taking office), the securities issued by Companhia de Saneamento do Paraná - SANEPAR, as described below:

TYPE* (OF SECURITIES or DERIVATIVE FINANCIAL INSTRUMENT)	QUANTITY	AMOUNT (BRL)	TOTAL INVESTMENT VALUE (BRL)

**OCCURRENCE OF TRANSACTION**

DATE OF TRANSACTION	
ACQUISITION/DISPOSAL	
QUANTITY	
TYPE OF SECURITY	
VALUE PER SECURITY (BRL)	
TOTAL INVESTMENT VALUE (BRL)	
OPERATION**	
INTERMEDIATE***	
PURPOSE OF MY PARTICIPATION	
QUANTITY OF SECURITIES HELD DIRECTLY OR INDIRECTLY	
CONTRACT/AGREEMENT****	

\*Type and class, in the case of shares, and other characteristics in the case of other securities.

\*\*Specify which operation was performed: Debenture conversion shares; Purchase; Loan contracting (Lessor); Loan contracting (Lessee); Converted debentures; Split/Bonus; Withdrawal/output; Loan return (Lessor); Loan return (Lessee); Exercise of subscription bonus; Exercise of call option plan; Grouping; Other deliveries/outputs; Other receipts/inputs; Possession/entry; Initial balance; Subscription and Sale).

\*\*\*Inform the intermediary agent (name and CNPJ) of the operation.

\*\*\*\*Inform Contract or agreement regulating or limiting the voting power or the circulation of the securities indicated above.

Pursuant to CVM Resolution No. 44/2021, I DECLARE that I will notify the Company's Investor Relations Officer of any change in the information provided, as per the table above "Occurrence of Changes", within 5 (five) days after the completion of each transaction.

Curitiba, \_\_\_\_\_.

Signature: \_\_\_\_\_

## 12. HISTORY

Policy for Disclosure of Act or Fact and Trading of Securities Issued by Sanepar			Version	1
			Management Area	DFRI/GRI
			Secrecy	External Public:
Version	Date	Person in charge	Approver	Description of the Change
1	02/24/2022	Investor Relations Management	Board of Directors	Grouping the Policy for Disclosure of a Relevant act or Fact and the Policy for Trading Securities Issued by Sanepar, forming a single Policy. Updated in accordance with CVM Resolution No. 44/2021, which replaces the following Instructions: ICVM No.358, ICVM No.369 and ICVM 449.
2	12/19/2024	Investor Relations Management	Board of Directors	Updated in accordance with CVM Resolution No. 80/2022, which replaces the following Instruction: CVM No.480/2022 and Updated in accordance with CVM Resolution No. 160/2022, which replaces the following Instructions: CVM No. 400/2003 and No. 476/2009.