



RELEVANT INFORMATION DISCLOSURE AND SECURITIES TRADING POLICY OF PADTEC HOLDING S.A.

CHAPTER I - OBJECT AND SCOPE

This Relevant Information Disclosure and Securities Trading Policy issued by Padtec Holding SA ("Padtec Holding" or "Company") ("Policy") - the terms of which are set out in Annex I - aims to establish high standards of conduct and transparency, to be compulsorily observed by (a) members of the Board of Directors, Executive Board and Fiscal Council, Controlling Shareholders, shareholders who elect members of the Board of Directors and members of the other Bodies with Technical or Advisory Functions of the Company; (b) Employees and Executives with access to Material Information; and (c) whoever, by virtue of their position, function or position in the Parent Company, in the Subsidiaries, especially its wholly-owned subsidiary Padtec SA ("Padtec"), and in the Affiliated Companies, has access to information related to Act or Material Fact about the Company ("Related Persons"), in order to adapt the Company's internal policy to the principle of transparency and good conduct practices in the use and disclosure of Material Information.

Related Persons must sign the Adhesion Term to this Policy, pursuant to articles 15, sole paragraph, and 16, paragraph 1 of CVM Instruction 358/2002, and its subsequent amendments ("ICVM 358") and in accordance with model attached to this Policy as Annex II.

In compliance with the provisions of paragraph 2 of article 16 of the aforementioned regulation, the Company will maintain at its headquarters, at the disposal of CVM, the list of people who have signed the Adhesion Term, with their respective qualifications, indicating position or function, address and registration number in the National Register of Legal Entities or Individuals.

Any doubts about the application of this Policy should be addressed to the Investor Relations area of Padtec Holding.

CHAPTER II - PRINCIPLES

The Related Persons shall act in compliance with all CVM instructions and any other applicable norm or law, guiding their conduct in accordance with the values of good faith, loyalty and veracity and, also, by the general principles established herein.

All efforts in favor of the efficiency of the capital markets must aim that competition among investors for better returns takes place through the analysis and interpretation of the information disclosed and never through privileged access to it, since, when transparent, precise and timely, such information constitutes the main instrument available to the investing public and the Company's shareholders, so that they are guaranteed the indispensable equitable treatment.

In this sense, the Company's relationship with participants and decision makers in the capital markets must be uniform and transparent.

The Related Persons must ensure that the disclosure of information about the Company operating, equity and financial situation is correct, complete, continuous and carried out through the Officers responsible for this function, and must also include data on the evolution of their respective shareholding positions in the Company's capital, as provided herein and in accordance with the regulations in force.

CHAPTER III - POLICY ON DISCLOSURE AND USE OF MATERIAL ACT OR FACT INFORMATION

Obligations

ICVM 358 created a system of responsibility for the use, communication and disclosure of publicly-held companies' Material Act or Fact, with the Investor Relations Officer being given primary responsibility for the communication and disclosure of a Material Act or Fact.

Members of the Board of Directors, Executive Board and Fiscal Council, Controlling Shareholders, and members of the other Bodies with Technical or Advisory Functions of the Company must communicate any Material Act or Fact that they are aware of to the Investor Relations Officer, who will promote its disclosure.

In the event that the aforementioned persons are aware of a Material Act or Fact and note the failure of the Investor Relations Officer to comply with his duty of communication and disclosure, they will only be released from liability if they immediately communicate such information to the CVM.

The persons mentioned above are required to, directly or through the Investor Relations Officer, immediately disclose the material act or fact, in case the information escapes control or if there is an atypical fluctuation in the quotation, price or volume traded of securities issued by the Company or related thereto.

Objective of Disclosure of Material Act or Fact

The purpose of disclosing a Relevant Act or Fact is to assure investors of the availability, in a timely and efficient manner, of all the data necessary for their decisions, in order to prevent the misuse of privileged information in the capital markets.

Definition of Material Act or Fact

Pursuant to Article 2 of ICVM 358, a Material Act or Fact is considered (a) any decision by the Controlling Shareholder (s), resolution by the General Shareholders Meeting or by the Company Management bodies; or (b) any act or fact of a political-management, technical, business or economic-financial nature that has occurred or is related to its business that may have a significant influence:

- (1) in the perception of the Company's value;
- (2) in the quotation of Securities;
- (3) the decision of investors to purchase, sell or maintain their Securities; or
- (4) the decision of investors to exercise any rights inherent to the condition of holder of the Securities.

Examples of Material Act or Fact

Article 2 of ICVM 358 lists, in a non-exhaustive manner, examples of a Relevant Act or Fact, therefore, its repetition is unnecessary.

In any case, however, the events related to the Material Act or Fact must have their materiality analyzed in the context of the ordinary activities and the size of the Company, as well as the information previously disclosed, in order to avoid trivializing the disclosures of the Act or Material Fact and, consequently, impair the quality of the analysis, by the capital markets, of the Company perspectives.

Terms

The disclosure of a Relevant Act or Fact should occur, whenever possible, before the beginning or after the closing of trading sessions on the Stock Exchanges on which the Securities are traded, and if any securities issued by the Company are being traded abroad, the opening hours of the local market in Brazil will prevail.

Regarding the deadlines for informing and disclosing, the Investor Relations Officer must also observe the following:

- (1) communicate and disclose the Material Act or Fact that occurred or related to the Company business immediately after its occurrence (ICVM 358, Article 3, caput);
- (2) to disclose, in advance or concurrently, to the entire market the Material Act or Fact to be conveyed in any means of communication, including information to the press, or in meetings, with analysts, investors, or with selected public, in Brazil or abroad (ICVM 358, Article 3, paragraph 3); and
- (3) evaluate the need to request, simultaneously, both from local and foreign Stock Exchanges, the suspension of trading of Securities, for the time necessary for the adequate dissemination of Material Information, in case it is imperative that the disclosure of a Material Act or Fact occurs during trading hours (ICVM 358, Article 5, § 2).

Who and How to Inform

Any Material Act or Fact that occurred or related to the Company business must be simultaneously disclosed and communicated to the CVM and the Stock Exchange.

In compliance with the provisions of CVM Instruction 547/2014 (amendment to ICVM 358), the disclosure of such information must take place through widely circulated newspapers commonly used by the Company or through news portals on the Internet.

The Company may, at each disclosure of a Material Act or Fact that may occur, choose to perform it in a summarized manner, indicating the addresses on the Internet where the complete information will be available to all investors, in a content at least identical to that sent. CVM and the Stock Exchange.

Privileged Information and the Duty of Secrecy

Related Persons or, whoever, by virtue of their function or position in the Parent Company, in the Controlled Companies, in particular its wholly owned subsidiary Padtec, and in the Associated Companies, have access to Relevant Information and has signed the Adhesion Term, shall have the duty to (a) keep confidential the information related to a Relevant Act or Fact to which they have privileged access until its disclosure to the market and (b) ensure that subordinates and third parties they trust also do so, responding jointly to them in the event non-compliance with the duty of secrecy (ICVM 358, Article 8).

Non-Disclosure of Material Act or Fact

The general rule in relation to a Relevant Act or Fact is that of its immediate communication and disclosure, so that, according to the caput of Article 6 of ICVM 358, any exception must be analyzed.

Thus, if the Controlling Shareholders or Officers understand that the disclosure of such information will put at risk some legitimate interest of the Company, the rule in question may not be observed.



However, even if those indicated above decide not to disclose a Material Act or Fact, it is their duty to immediately disclose such information, directly or through the Investor Relations Officer, in the event that the information is out of control or if an atypical fluctuation occurs in quotation, price or quantity traded of the Securities issued by the Company (ICVM 358, Article 6, sole paragraph).

CHAPTER IV - PROCEDURES FOR COMMUNICATING INFORMATION ON TRADING BY MANAGEMENT AND RELATED PERSONS

The procedures for communicating information on the trading of Securities issued by the Company provided for in this Chapter IV are based on Article 11 of ICVM 358.

The Officers, the Fiscal Council members, shareholders who elect members of the Board of Directors and the members of the Bodies with Technical or Advisory Functions of the Company must inform the quantity, characteristics and form of acquisition of the Securities that they hold or that are included in on behalf of Related Persons, as well as any changes made to those positions.

This information must be forwarded by the persons mentioned above to the Investor Relations Officer and, by this, to the CVM and the Stock Exchange, according to the form that constitutes Annex III of this Policy, always in a timely manner so that the terms below are met in a timely manner.

The communication to the CVM and the Stock Exchange will have to be made (a) immediately after the person is invested in the position and (b) within a maximum period of 10 (ten) days after the end of the month in which there is a change in the positions held, indicating the position balance in the period.

CHAPTER V - PROCEDURES FOR COMMUNICATION AND DISCLOSURE ABOUT THE ACQUISITION OR DISPOSAL OF RELEVANT SHAREHOLDING POSITION

The procedures for communicating and disclosing information on the trading of Securities issued by the Company that involve a relevant shareholding position provided for in this Chapter V are based on Article 12 of ICVM 358.

As established by CVM Instruction 568/2015 (an amendment to ICVM 358), relevant shareholding position is considered to be the business or group of businesses through which direct or indirect participation exceeds, up or down, the levels of 5% (five percent), 10% (ten percent), 15% (fifteen percent), and so on, of a type or class of shares representing the Company's share capital.

The Controlling Shareholders, direct or indirect, and the shareholders who elect members of the Board of Directors, must communicate, as well as disclose, in the manner prescribed by law, any information on the acquisition or disposal of relevant shareholding position.

The statement regarding the acquisition or sale of a relevant shareholding position to be forwarded to the CVM and the Stock Exchange must contain the information contained in the template presented at Annex IV of this Policy.

Such communication must be sent to the Investor Relations Officer immediately after reaching any level mentioned above in this Chapter.

CHAPTER VI - RESTRICTIONS ON THE TRADING OF SECURITIES ISSUED BY THE COMPANY

ICVM 358 establishes, in some situations, restrictions on the trading of securities of publicly held companies by certain persons.

Trading Restrictions Pending the Disclosure of a Material Act or Fact

In the hypotheses (1), (2) and (3) below, the Securities cannot be traded by the Company, by the Related Persons, and by anyone, due to their function or position in the Parent Company, in the Companies Subsidiaries, especially its wholly-owned subsidiary Padtec, and in the Affiliated Companies that have signed the Adhesion Term, that knows about any information related to a Material Act or Fact that has not yet been disclosed to the market.

- (1) whenever any Material Act or Fact occurs in the Company business that the people listed above are aware of;
- (2) whenever an option or mandate has been granted for the purpose of acquiring or disposing of shares issued by the Company by the Company itself, its Subsidiaries, especially its wholly-owned subsidiary Padtec, its Affiliated Companies or another company under common control; and
- (3) whenever there is an intention to promote incorporation, total or partial spin-off, merger, transformation or corporate reorganization.

Exceptions to General Restrictions on Securities Trading

The aforementioned prohibitions do not apply to transactions with shares held at the Company's treasury, through private negotiation, resulting from the exercise of the call and put option in accordance with the stock option plan approved by the Company General Shareholders Meeting and eventual repurchases made by the Company, also through private negotiation, of these shares.

Restrictions on Trading after the Disclosure of a Material Act or Fact

In the cases provided for above, even after the disclosure of a Material Act or Fact, the prohibition on trading will continue to prevail if it may - in the opinion of the Company - interfere with the conditions of said transactions, in order to cause damage to the Company itself or to its shareholders (ICVM 358, Article 13, §5º). Such restriction must be informed by the Investor Relations Officer.

Prohibition of Trading in Period Prior to Information Disclosure Quarterly and Annual Reports and Financial Statements

The Company, Officers, Controlling Shareholders (direct and indirect), members of Fiscal Council, shareholders who elect members of the Board of Directors, Employees and Executives with access to Relevant Information and members of the other Bodies with Technical or Advisory Functions of the Company, and whoever that due to their function or position in the Parent Company, in the Controlled Companies, especially its wholly-owned subsidiary Padtec, and in the Associated Companies, learn about information related to a Material Act or Fact about the Company, and that have signed the Adhesion Term, cannot trade the Securities in the period of 30 (thirty) days before the disclosure or publication, when applicable, of the Company's quarterly and annual information.

Prohibition of Deliberation Regarding the Acquisition or Disposal of Shares of Issuance by the Company (ICVM 358, Article 14)

The Board of Directors will not be able to resolve on the acquisition or disposal of shares of the Company's own issuance until it is made public, through the disclosure of a Relevant Act or Fact, information related to:

- (1) entering into any agreement or contract aimed at transferring the Company's share control; or



- (2) granting of an option or mandate for the purpose of transferring the Company's share control; or
- (3) existence of intention to promote incorporation, total or partial spin-off, merger, transformation or corporate reorganization.

Prohibition of Trading Applicable to Former Officers

Officers who depart from the Company's management before the public disclosure of a business or a fact started during their term of office may not trade Securities issued by the Company:

- (1) for a period of 6 (six) months after his departure; or
- (2) until the disclosure, by the Company, of the Material Act or Fact, unless, in this second hypothesis, trading with the Company shares, after the disclosure of the Material Act or Fact, may interfere in the conditions of such business to the detriment of shareholders of the Company or of itself.

Among the alternatives indicated above, the event that occurs first will always prevail.

CHAPTER VIII - FINAL PROVISIONS

Indirect and Direct Negotiations

The prohibitions on negotiations regulated in this Policy apply to negotiations carried out, directly or indirectly, by the Officers, Controlling Shareholders, Fiscal Council members, shareholders who elect members of the Board of Directors, Employees and Executives with access to Relevant Information and members of the other Bodies with Technical or Advisory Functions of the Company, and also by those who, by virtue of their function or position in the Parent Company, in the Controlled Companies, especially its wholly owned subsidiary Padtec, and in the Associated Companies, know about information related to Act or Fact Relevant, and that have signed the Adhesion Term, even in cases where negotiations by these people take place through:

- (1) companies controlled by them;
- (2) third parties with whom a trust agreement or stock portfolio management is maintained.

Indirect trades are not considered to be those carried out by investment funds of which the persons mentioned above are shareholders, provided that:

- (1) investment funds are not exclusive;
- (2) the investment fund manager trading decisions cannot be influenced by its shareholders.

Responsibility of the Investor Relations Officer in the Follow-up of Investments Disclosure and Trading Policies

The Investor Relations Officer is the person responsible for executing and monitoring the Company's disclosure and use of information policies.

Policy Change

This Policy, approved by the Company Board of Directors at a meeting held on May 10, 2012, had its updates approved at meetings held on March 16, 2017, September 28, 2018 and July 10, 2020. Any alteration or revision in its text will have to be submitted to that same body.



Third Party Responsibility

The provisions of this Policy do not eliminate the liability arising from legal and regulatory requirements imputed to third parties not directly linked to the Company who are aware of a Material Act or Fact and will deal with Securities issued by the Company.

Finally, any doubts about the application of this Policy should be addressed to Padtec Holding Investor Relations area.

ANNEX I DEFINITIONS

The terms and expressions listed below, when used in this Policy, shall have the following meanings:

“Controlling Shareholders” or “Controlling Shareholder” - the shareholder or group of shareholders bound by a shareholders agreement or under common control that exercises the control power of Padtec Holding SA, pursuant to Law No. 6,404 / 76 and subsequent amendments.

“Officers” - the members of the Board of Directors and Executive Officers of Padtec Holding SA

“Stock Exchange” - B3 SA - Brasil, Bolsa, Balcão or other stock exchanges where the securities issued by Padtec Holding SA are admitted for trading, in Brazil or abroad.

“Company” - Padtec Holding SA

“Fiscal Council” - the members of the Fiscal Council, sitting and alternate members, when installed as decided by the Company’s General Shareholders Meeting.

CVM – Comissão de Valores Mobiliários, the Brazilian Securities Exchange Commission

“Investor Relations Officer” - the Officer of Padtec Holding SA responsible for providing information to the investing public, the CVM, the Stock Exchange or organized over-the-counter market entity, as well as updating the Company registration.

“Former Officers” – the Former Officers and Former Directors who no longer belong to the Company’s management.

“Employees and Executives with access to Relevant Information” – the Company’s employees who, by virtue of their function or position at Padtec Holding SA, have access to any Privileged Information.

“Privileged Information” and “Relevant Information” - all relevant information related to the Company capable of considerably influencing the price of the Securities and not yet disclosed to the investing public.

“CVM Instruction 358/2002” or “ICVM 358” - CVM Instruction 358, of January 3, 2002, and subsequent amendments, which provides for the disclosure and use of information on Material Act or Fact related to publicly-held companies, as well as on the trading of securities issued by publicly-held companies pending a disclosure of a material fact, among other matters.

“CVM Instruction 547/2014” - CVM Instruction 547, of February 5, 2014, which changes provisions of CVM Instruction 358, of January 3, 2002.

“CVM Instruction 568/2015” - CVM Instruction 568, of September 17, 2015, which changes and adds provisions to CVM Instruction 358, of January 3, 2002.

“Bodies with Technical or Advisory Functions” - the Company’s bodies created by statutory provision that have technical functions or are intended to advise its Officers.

“Related Persons” - the persons who maintain the following relationship with Officers, members of the Fiscal Council and members of the Bodies with Technical or Advisory Functions of the Company: (a) the spouse of whom is not legally separated or extrajudicially; (b) the partner; (c)



any dependent included in the annual income tax return; and (d) companies controlled directly or indirectly, either by the Officers or by Related Persons.

“Policy” - this Relevant Information Disclosure and Securities Trading Policy issued by Padtec Holding SA.

“Affiliated Companies” - companies in which the Company participates, with 10% (ten percent) or more, without controlling them.

“Controlled Companies” - companies in which the Company, directly or through other subsidiaries, holds the rights that permanently assures it preponderance in corporate resolutions and the power to elect the majority of the officers.

“Adhesion Term” - the term of adhesion to the present Policy, which must be signed in the form of Articles 15, single paragraph and 16, paragraph 1 of ICVM 358.

“Securities” - covers any shares, debentures, subscription bonuses, receipts and subscription rights, promissory notes, call or put options, indices and derivatives of any kind, or any other securities or collective investment contracts of issued by the Company, or referenced to them, which, by legal determination, are considered securities.

ANNEX II

ADHESION TERM TO THE RELEVANT INFORMATION DISCLOSURE AND SECURITIES TRADING POLICY OF PADTEC HOLDING SA

By this instrument, [insert name and qualification], resident and domiciled at [address], holder of identity card no. [number and issuing agency] and enrolled at Brazilian Register of Individual Taxpayer - CPF / MF under number [number], hereinafter referred to as simply Declarant, in the capacity of [indicate the position, function or relationship with the Company] of the [Company], company [type of company], with registered office at [address], registered in the National Registry of Taxpayers - CNPJ under number [number], hereinafter simply called the Company, declares, through this Adhesion Term, to have full knowledge of CVM Instruction 358/2002 and the rules contained in the Relevant Information Disclosure and Securities Trading Policy of Padtec Holding SA, the copy of which was received, obliging itself to guide its actions always in accordance with such rules.

[place and date]

[declarant's name]

Witnesses:

1. _____
Name:
ID:
Brazilian Registry of Individual Taxpayer
- CPF:

1. _____
Name:
ID:
Brazilian Registry of Individual Taxpayer -
CPF:

ANNEX III TRADING BY MANAGEMENT AND RELATED PERSONS

Issuing Company: Padtec Holding SA							
Name:				Brazilian Register of Individual Taxpayer / National Registry of Taxpayers - (CPF/CNPJ):			
Qualification and, if you are a Related Person, relationship with the communicator:							
Opening Balance							
Securities	Characteristics	Quantity	% participation				
			Same Species / Class			Total	
Movement in the Month							
Securities	Characteristics	Intermediary	Transaction (Purchase / Sell)	Day	Quantity	Price	Volume (R\$)
Closing Balance							
Securities	Characteristics	Quantity	% participation				
			Same Species / Class			Total	

ANNEX IV ACQUISITION OR DISPOSAL OF RELEVANT SHAREHOLDING POSITION

Acquirer / Seller Name:
Qualification: [indicate Brazilian Register of Individual Taxpayer - CPF or National Registry of Taxpayers - CNPJ number]
Business Date:
Issuing Company:
Business Type:
Type of Securities:
Target Quantity:
Quantity by Species and Class:
Purpose of Participation, and, if applicable, statement that the business does not aim to change the composition of the control or the management structure of the company:
Number of debentures convertible into shares, already held, directly or indirectly, by the acquirer or by Related Person:
Number of shares subject to conversion of debentures, by type and class, if applicable:
Number of other securities and stock options, by type and class, already held, directly or indirectly, by the acquirer or Related Person:
Indication of any agreement or contract regulating the exercise of voting rights or the purchase and sale of securities issued by the Company:
If the shareholder is resident or domiciled abroad, the name or corporate name and the registration number in the Individual Taxpayer Register or in the National Register of Legal Persons of his agent or legal representative in the country for the purposes of art. 119 of Law No. 6.404/1976.
Other relevant information: