Social, Environmental and Climate Responsibility Policy

ESG

March 2026

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1. Purpose and Scope

The purpose of this Policy is to define the principles and guidelines of a social, environmental and climate to be observed by the entities that are part of the BTG Pactual Prudential Conglomerate (BTG Conglomerate), as well as by the entities of the BTG Pactual Economic Group (understood as the entities directly or indirectly controlled by BTG Pactual S.A. and that appear in the Consolidated Financial Statement) in the conduct of their business, activities and its operational processes, as well as the relationship with customers and other stakeholders. It was structured in accordance with Banco BTG Pactual's management strategies, Resolution No. 4,945 of the National Monetary Council ("CMN") of September 15, 2021, appropriate to the size and relevance of exposure to social risk, environmental risk and climate risk, as provided for in Resolution No. 4,557 of February 23, 2017, as well as the Circular of the Superintendence of Private Insurance ("SUSEP") No. 666 published on June 27, 2022. For the purposes of complying with SUSEP's rule, the Social, Environmental and Climate Responsibility Policy is considered to be a sustainability policy.

2. Scope and Applicability

This Policy applies to BTG Pactual, covering the conduct of its business, activities and operational processes, as well as the relationship with clients and other stakeholders, in Brazil and abroad.

The application of this Policy reaches all areas, employees, managers, external consultants, temporary teams and third parties acting on behalf of or in the interest of BTG Pactual, as applicable to their activities.

BTG Pactual may adopt specific policies related to ESG issues, subject to the particularities of its operations, provided that such policies are, at least, aligned with the guidelines established in this Policy.

Failure to comply with the provisions of this Policy may result in the application of internal disciplinary measures, in accordance with the applicable regulations, including, when applicable, dismissal.

3. Definitions

For the purposes of this Policy and considering the principles of relevance and proportionality, the following definitions are adopted:

BTG Pactual: Banco BTG Pactual S.A.

ESG: a set of criteria and practices related to environmental, social, and governance aspects, used to guide decisions, assess risks and opportunities, and promote responsible and sustainable action.

PRSAC: BTG Pactual's Social, Environmental and Climate Responsibility Policy.

Board of Directors: BTG Pactual's highest governance body, responsible for the strategic oversight, approval and review of this Policy.

CSO - *Chief Sustainability Officer*: director responsible for coordinating, supervising and monitoring actions related to the ESG agenda, according to the attributions defined in this Policy.

ESG Committee: governance body responsible for supporting the Board of Directors in supervising the ESG agenda, according to the attributions defined in this Policy.

ESG Agenda: set of guidelines, initiatives, actions, and commitments related to environmental, social, and climate aspects, defined and monitored within the scope of this Policy.

Stakeholders: individuals or legal entities that may be impacted or influence BTG Pactual's activities, including, but not limited to, customers, employees, suppliers, partners, investors, regulators and society in general.

Environmental nature: practices aimed at the preservation and repair of the environment, including its recovery, when possible.

Environmental risk: illegal conduct or activity offensive to fauna or flora, including deforestation, degradation of biomes, damage to biodiversity, air, water and soil pollution, environmental degradation, actions that result in environmental disaster and non-compliance with environmental licensing conditions.

Social nature: respect, protection and promotion of fundamental rights and guarantees of common interest.

Social risk: work in conditions analogous to slavery, child labor, discrimination in general, pedophilia, sexual exploitation, organ trafficking, human trafficking, pornography, prostitution, irregular acts that negatively impact traditional communities, acts harmful to public, historical or cultural heritage, environmental disaster resulting from human intervention, among other events or conducts that expose society to risks.

Climate nature: BTG Pactual's positive contribution (i) to the transition to a low-carbon economy, through the reduction or compensation of greenhouse gas emissions and the preservation of natural mechanisms for capturing these gases; and (ii) to the reduction of impacts caused by increasingly frequent and severe bad weather or by long-term environmental changes associated with changes in weather patterns.

Climate risk: possibility of losses resulting from events associated with climate change, subdivided into:

- **Physical climate risk:** related to extreme events, such as droughts, floods, forest fires, or to permanent environmental changes, such as sea level rise, desertification, and changes in precipitation or temperature patterns.

- **Transition climate risk:** related to changes in the transition process to a low-carbon economy, including regulatory changes, carbon pricing, impacts on the supply and demand of products and services, embargoes, and negative perception by customers, the financial market, or society in general.

4. Responsibilities

4.1. Board of Directors

- Approve and revise this Policy.
- Supervise the performance of the CSO and the ESG Committee.
- Ensure the effectiveness of the Policy and its compatibility with other corporate policies.
- Ensure that BTG Pactual's activities adhere to the guidelines of this Policy.
- Ensure the timely correction and improvement of the guidelines provided for herein.

4.2. CSO – *Chief Sustainability Officer*

- Promote and supervise the dissemination and dissemination of information in this Policy.
- Define and supervise actions aimed at incorporating ESG principles and guidelines into BTG Pactual's activities and business.
- Determine and supervise the implementation of the actions necessary to ensure the effectiveness of the Policy.
- Provide information and participate in decision-making processes related to the implementation and review of this Policy.

4.3. ESG Committee

- To assess the degree of adherence of the actions implemented by BTG Pactual entities to the guidelines of this Policy.
- Propose improvements or revision of this Policy, when necessary.
- To act as an auxiliary body of the Board of Directors in the definition and review of this Policy.
- To assess the adherence of this Policy to BTG Pactual's ESG risk levels and objectives.
- Act in coordination with the Risk and Capital Committees and the Audit Committee.

4.4. Compliance and Internal Controls

- Ensure, together with the CSO and the ESG Committee, compliance with the activities provided for in the ESG Agenda established by this Policy.

4.5. BTG Pactual and Employees

- Observe and comply with all the guidelines of this Policy.
- Ensure that specific entities' own policies are at least compatible with this Policy.
- Act in accordance with the principles and guidelines set forth herein.
- Be aware that non-compliance with this Policy may result in disciplinary actions, according to internal regulations.

5. Internal Processes

5.1. Fundamentals

Since the beginning of its operations, BTG Pactual has been guided by the pillars of meritocracy and *partnership*, in which the talent, dedication and performance of our employees, partners and managers constitute the foundations of our development and our continuous growth over time, with profitability and always with a long-term vision. In compliance with our Code of Business and Ethics, we always act with integrity, responsibility, simplicity, non-conformity and dedication.

Throughout our history, we have demonstrated resilience in the face of the most diverse economic scenarios and the adversities of the markets in which we operate, delivering solid and consistent results to our clients, through the offer of high-quality financial products and services. We value the excellence of our performance and the long-term relationship with our customers.

BTG Pactual, in conducting its business, activities and operational processes, assumes commitments based on responsible and sustainable business practices, balancing economic, financial, regulatory, environmental, social and climate aspects in its operations. We believe that sound business practices and corporate responsibility are long-term fundamentals that must be applied daily to generate shareholder and customer value through long-term sustainable growth.

5.2. Fundamental Principles

At BTG Pactual, we:

- We respect and promote human rights, in line with the Principles of the UN Global Compact and its Universal Declaration of Human Rights.
- We align our business strategy to fully meet the needs of our customers and business partners and society in general in the countries where we operate.
- We incorporate ESG criteria into our decision-making processes, aiming to understand the environmental, social and climate risks and opportunities of each new relationship or each new business.

5.3. Guidelines and Actions for Implementation

- We seek recognition as an inducer and promoter of the ESG agenda, as an advisor to our clients, aiming at the transition to a low-carbon and more sustainable economy.

- We assess the environmental, social and climate risks of each of our clients, suppliers and partners in addition to our operations and our business, respecting the principles of relevance and proportionality, as well as the profile of each of BTG Pactual's clients.

- We have developed methods of socio-environmental analysis and integration of environmental, social and corporate governance aspects for the management of third-party assets, including climate variables in these analysis models.

- We develop new products so that, in addition to providing financial returns, they bring environmental and social benefits to society; For example: promotion of socioeconomic inclusion; and reduction of social inequalities.

- We work together and with integration of the business and *backoffice areas,* to ensure full adherence to our voluntary market commitments and the coordination of responses to sustainability indices and awards.

- We carry out awareness programs, sustainability training and maintain internal and external dialogue channels with our stakeholders, including the community in which we operate, thus preserving a responsible and transparent relationship.

- We work responsibly with our clients to encourage sustainable practices that enable prosperity and an ecologically balanced environment, for the benefit of current and future generations.

- We promote a diverse, egalitarian and inclusive work environment and communicate indicators of progress in our ESG agenda, in a transparent manner.

- We identify the social, environmental, and climate impacts resulting from our operations and business.

- We seek to be transparent and accountable in relation to our negative impacts, which may occur occasionally and involuntarily, in relation to our contributions with respect to social, environmental and climate aspects, as well as the other commitments assumed by BTG Pactual in these areas.

- Our credit portfolio includes eligible operations, classified according to the social and environmental criteria defined in the Sustainable Finance Framework. These criteria guide the identification, evaluation and classification of Corporate Lending operations, ensuring that the allocation of resources is aligned with categories that generate environmental and/or social benefits, as well as with internal guidelines for managing socio-environmental and climate risks.

- We define strategies for managing risks and opportunities related to climate change, incorporating mitigation and adaptation measures in an integrated manner into our risk management framework and business decisions, as well as the identification and use of opportunities associated with the transition to a low-carbon economy.

- We adopt ethical and transparent conduct, consistent with fair practices in our operations and business, and we make available, in a timely manner, complete, accessible information compatible with the profiles of our clients.

- We adopt practices for the efficient use of natural resources, biodiversity conservation, and mitigation of environmental impacts arising from our activities and operations.

5.4. Governance

ESG Committee

The governance structure of this Policy includes the performance of BTG Pactual's ESG Committee, which acts as a support body for the Board of Directors in supervising the implementation, monitoring and review of the guidelines of this Policy.

The ESG Committee works in an integrated manner with BTG Pactual's other governance bodies, including the Risk and Capital and Audit Committees, ensuring institutional alignment and adequate assessment of topics related to social, environmental and climate aspects.

The duties and responsibilities of the ESG Committee are defined in Item 4 – Responsibilities of this Policy.

5.5. Communication and Transparency

BTG Pactual seeks the continuous improvement of its policies and practices in the management of risks and opportunities related to environmental, social and climate aspects, following the evolution of applicable regulations and the best market practices, always respecting the peculiarities of its operations, in line with the principles of relevance, proportionality and legality.

This Policy is periodically reviewed, not exceeding three years, at the initiative of the CSO and/or the head of ESG, followed by deliberation by the ESG Committee and approval by BTG Pactual's Board of Directors.

Feedback and transparency are essential parts of our commitment to sustainability. In accordance with these requirements, the disclosure of indicators on the actions implemented by BTG Pactual, with a view to the effectiveness of this Policy, will be reported in our annual report, which is published on our website.

BTG Pactual also provides communication channels, such as SAC and Ombudsman, which are available to our clients and interested parties to receive demands on this Policy. Demands can also be directed to BTG Pactual's ESG team, via email OL-ESG @btgpactual.com.

5.6. Action Control

Due to its importance to BTG Pactual, all BTG Pactual employees must observe the principles and comply with the guidelines set forth in this Policy, under penalty of disciplinary action, including termination.

BTG Pactual's Compliance and internal controls structure, together with the CSO and the ESG

Committee, is responsible for ensuring compliance with all activities of our ESG Agenda provided for in this Policy. Any exception to this Policy must be submitted, through the CSO and/or head of ESG, to the decision of the ESG Committee.

6. Authorities

The powers related to this Policy respect the formal attributions of BTG Pactual's governance bodies, as described below:

6.1. Board of Directors

The Board of Directors is responsible for approving and reviewing this Policy, supervising the performance of the CSO and the ESG Committee, and recommending measures to ensure its effectiveness, compatibility with other policies, and timely improvements.

7. Exceptions

Any exception to this Policy must be submitted, through the CSO and/or head of ESG, to the decision of the ESG Committee.

Violations of this Policy may result in internal disciplinary action in the entities that are members of BTG Pactual, in accordance with its regulations, including termination.

8. Related Documents and Regulations

This policy is governed by best practices, specific regulations, as well as any updates and regulatory changes:

Standards:

- National Monetary Council (CMN) Rules.
- Rules of the Central Bank of Brazil (BACEN) and the Securities and Exchange Commission (CVM).
- Rules of the Superintendence of Private Insurance (SUSEP).
- Banking Self-Regulation of the National Federation of Banks (FEBRABAN).
- Standards on Responsible Investment Policy.
- Rules on Compensation Policy.
- Timberland Responsible Investment Policy Guidelines.
- Resolution of the National Monetary Council (CMN) No. 4,945, of September 15, 2021.
- Resolution of the National Monetary Council (CMN) No. 4,557, of February 23, 2017.
- Circular of the Superintendence of Private Insurance (SUSEP) No. 666, of June 27, 2022.

Documents:

- BTG Pactual Code of Conduct.

- ESG Integration Procedure and Sustainability Programs.
- Sectoral Policies.
- Diversity Policies.
- BTG Pactual's Global Risk Management Policy and Control Structure.