

VINCI COMPASS

Order Allocation Policy *Vinci Equities Gestora de Recursos*

October 2026

1. Purpose

1.1. Vinci Equities Gestora de Recursos Ltda. ("Vinci Equities"), in its capacity as the manager of various investment funds with different investment strategies and policies ("Fund" or "Funds"), and in compliance with the investment fund regulations issued by the Brazilian Securities and Exchange Commission ("CVM") as well as ANBIMA's self – regulatory rules, hereby establishes this Order Allocation Policy ("Policy").

2. Subject Matter

2.1 This Policy has been prepared in accordance with the applicable regulations issued by the Brazilian Securities and Exchange Commission (CVM) and ANBIMA's self-regulatory rules and guidelines, and shall apply uniformly to all Investment Funds managed by Vinci Equities.

3. Key Principles

- 3.1. The implementation of the Policy shall be monitored by Vinci Equities.
- 3.2. The main purpose of the Policy is to protect the best interest of the Funds' investors and ensure equitable results across the Funds through a specified order allocation system and in compliance with the parameters set out herein. A Fund is not to make financial gain to the detriment of another Fund and no conflict of interest is allowed in allocating investment opportunities.
- 3.3. This Policy benefits the Funds' investors in general, insofar as it ensures that any gains or losses recorded in a given Fund's portfolio result solely from the management actions undertaken by Vinci Equities in connection with the management of such Fund, and not from manipulation and/or operational errors unrelated to investment decisions. In the discharge of its fiduciary duties, Vinci Equities is committed to the strict fulfillment of its obligations towards its clients and shall always use its best efforts to achieve this purpose.

4. Order Aggregation and Allocation

4.1. To fulfill the purpose of this Policy, in asset transactions with respect to each group of funds segregated by investment strategy, Vinci Equities shall aggregate orders to be placed on the market and allocate executed orders, specifying the amount to be allocated to each Fund according to the criteria set out in Clause 5 below and applying to each allocation the average price of the transactions.

4.2 Vinci Equities has in place equitable criteria to define the average price. This criterion consists of assigning to each Fund a share in the allocation of all lots of financial assets traded in the same session on a pro rata basis, according to the Fund investment policy and risk profile. Nonetheless, in some situations, for reasons beyond Vinci Equities' will, certain minor discrepancies in the average price may occur. An example is when the amount of financial assets to be assigned to a fund does not allow for the share in all lots traded in that day's session and Vinci Equities must choose to allocate the assets of a lot whose financial value is closest to the transactions average price.

4.3 Without prejudice to the pro rata allocation of financial assets according to the risk profile of each Fund, as defined in the Allocation Criteria set out in Clause 5 below, order aggregation and allocation under this Section shall be made separately based on each investment strategy. This means that the orders of the Funds that adopt the same strategy shall only be aggregated with and allocated among the Funds to which the same strategy is applied. Thus, such allocation average price as defined in clause 4.2 above shall be the same for each investment strategy.

4.3.1 Vinci Equities may aggregate orders to be placed on the market and allocate executed orders at the average price applicable to the Funds to which different strategies apply, provided that they trade the same financial assets in the same session, whenever Vinci Equities finds convenient or necessary to protect the integrity of portfolios.

4.4 The investment strategies adopted by Vinci Equities in aggregating and allocating orders are as follows:

4.4.1 "STRATEGIC DIVIDEND" STRATEGY – The open-end and exclusive/restricted Funds that employ this investing strategy target companies with high cash generation and solid distribution of dividends and/or interest on shareholders' equity throughout a year, as well as good market strength prospects, which belong to the universe of stocks in the IDIV, IBrX-100 e IBOVESPA indices. Considering the diverse investment profiles across the Funds, certain orders may be allocated to certain Funds only, as defined in the investment decisions made by Vinci Equities.

4.4.2 "TACTICAL DIVIDEND" STRATEGY – The open-end and exclusive/restricted Funds adopting this investment strategy target investments in companies that (i) account for the top 85% of the B3 Tradability

Index, in descending order; (ii) are traded in at least 95% of B3 trading sessions; (iii) account for at least 0.1% of the trading volume in the cash equity market (round lots); (iv) have a strong track record of dividend distributions and/or interest on shareholders' equity, as well as solid market fundamentals and growth prospects; and (v) belong to the universe of stocks included in the IDIV, IBrX-100 and IBOVESPA indices. Considering the diverse investment profiles across the Funds, certain orders may be allocated to certain Funds only, as defined in the investment decisions made by Vinci Equities

4.4.3 "LONG-ONLY" STRATEGY – The open-end and exclusive/restricted Funds adopting this investment strategy are managed based on a careful analysis of both macroeconomic and sector-specific fundamentals. The strategy invests in shares of companies with a strong track record of performance and attractive growth prospects. The objective of this strategy is to build a diversified and consistent portfolio with an investment horizon of three (3) to five (5) years. Considering the diverse investment profiles across the Funds, certain orders may be allocated to certain Funds only, as defined in the investment decisions made by Vinci Equities. [\[Equities -...tubro 2026 | Word\]](#), [\[265047834 | PDF\]](#)

4.4.4 "LONG-ONLY GLOBAL" STRATEGY – The open-end and exclusive/restricted Funds adopting this investment strategy are managed based on a careful analysis of both macroeconomic and sector-specific fundamentals and may diversify through investments in companies listed in global markets. The strategy invests in shares of companies with a strong track record of performance and attractive growth prospects. The objective of this strategy is to build a diversified and consistent portfolio with an investment horizon of three (3) to five (5) years. Considering the diverse investment profiles across the Funds, certain orders may be allocated to certain Funds only, as defined in the investment decisions made by Vinci Equities.

4.4.5 "FREE" STRATEGY – The open-end and exclusive/restricted Funds adopting this investment strategy target investments in companies that (i) account for the top 85% of the B3 Tradability Index, in descending order; (ii) are traded in at least 95% of B3 trading sessions; and (iii) account for at least 0.1% of the trading volume in the cash equity market (round lots). The Funds seek investments in companies with strong fundamentals and attractive long-term prospects. Considering the diverse investment profiles across the Funds, certain orders may be allocated to certain Funds only, as defined in the investment decisions made by Vinci Equities.

4.4.6 "NON-RESIDENT EXCLUSIVE" STRATEGY -The portfolios adopting this investment strategy may diversify through investments in companies listed in global markets. The portfolios seek investments in

companies with strong fundamentals and attractive long-term prospects. The objective of this strategy is to build a diversified and consistent portfolio with an investment horizon of three (3) to five (5) years. Considering the diverse investment profiles across the portfolios, certain orders may be allocated to certain portfolios only, as defined in the investment decisions made by Vinci Equities.

4.4.7. "CUSTOMIZED STRATEGIES" STRATEGY: Funds and portfolios that adopt this strategy have investment policies that are tailored to the specific characteristics of each client's mandate. Therefore, they may have different investment objectives, limits, restrictions, investment universes, investment horizons, and risk profiles. Investment decisions and order allocations will consider the specific characteristics and requirements of each mandate. Certain orders may only be allocated to eligible funds or portfolios as defined by Vinci Equities' investment decisions.

4.4.8 "LATAM EQUITY" STRATEGY: Funds and portfolios that adopt this strategy follow a diversified, long-only investment approach focused on Latin America. This approach seeks to capture the benefits of regional exposure while mitigating idiosyncratic country-specific risks. Due to the Funds' and portfolios' diverse investment profiles, Vinci Equities may allocate certain orders only to eligible Funds or portfolios.

5. Criteria

5.1 Vinci Equities is an asset manager primarily focused on the management of share classes of Financial Investment Funds ("FIFs") classified as Equity Funds ("Ações"), pursuant to CVM Resolution No. 175. Although such share classes belong to the same category, they may have different investment policies, strategies, target investors and risk profiles, as set forth in their respective fund regulations.

5.2 The criterion underlying this Policy, which shall guide the proportional allocation of orders among the Funds, is the risk profile of each Fund or share class, to which its investment policy, strategy, target investors and other characteristics set forth in its respective fund regulations are directly related. [

5.3 Furthermore, due to the different target investors of the Funds and share classes, including open and closed pension entities, specific legal limitations and restrictions may apply, reinforcing the importance of assessing the risk profile of each Fund or share class when determining the allocations to be made.

5.4 In the event of transactions carried out between Vinci Equities and (i) counterparties or financial intermediaries belonging to the same conglomerate or economic group as Vinci Equities; or (ii)

investment vehicles managed by Vinci Equities, the rules applicable to such investments as set forth in the regulations of the respective investment funds shall be observed. In the event of a potential conflict of interest, the Chief Compliance Officer shall be informed.

6. Update

6.1 This Policy has been approved by Vinci Equities Fund Management Team and may be updated by Vinci Equities at any time, whenever necessary, in accordance with the principles and guidelines set out herein and applicable laws.



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