

**Criteria for Trading with Securities and Personal Investments**

**04.2021**

This policy applies to all associates, members, employees and officers of Alaska Investimentos Ltda. (Alaska). It also applies to exclusive or restricted investment funds whose quotas are held by Alaska associates.

## **1. General Rules**

- a. Operations of sale and purchase of bonds and securities traded on the organized domestic market of Stock Exchange and Government Bonds (Tesouro Direto modality) will be mandatorily carried out at Banco BTG Pactual S.A.'s Broker or a company of the economic conglomerate.
- b. New associates who come to work at Alaska Asset will be able to hold positions already held - except derivatives - previous to the signature of the Instrument of Awareness.
- c. Positions previously held in derivatives shall be undone within thirty (30) calendar days from the signature of the Instrument of Awareness of this Policy.
- d. All operations that are not expressly approved by this manual must be previously consulted and approved by the Compliance Officer.

## **2. Operations without need for prior authorization**

- a. Investment in quotas in investment funds managed by Alaska Asset;
- b. Deposits in savings account;
- c. Investments in RDB/CDB, LCI, LCA, LIG;
- d. Investments in liquidity fund shares classified as fixed income, whose redemption rule is up to D+1.
- e. Investment in the Tesouro Direto;

## **3. Operations requiring prior authorization**

- a. Financial assets not mentioned above, for which prior authorization from the Compliance Board is required, including, but not limited to cryptoassets.

## **4. Prohibited operations**

- a. On any asset, when aware of the existence of an order to trade this asset on behalf of the fund;
- b. In periods of prohibition, as defined by ICVM 358/02<sup>1</sup>, when holding an administration position in a public-held company;
- c. Uncovered sales;
- d. Leasing of shares as a lessee;
- e. Adherence to the product Margin Account;
- f. Arbitration;
- g. Long&short operations;
- h. Operations in the future, forward, option markets;
- i. With any other derivatives admitted to trading on B3, on an Organized Over-the-Counter Market, whether fixed or variable income;

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<sup>1</sup> Art. 13. Prior to any disclosure of a relevant act or fact occurred in the company's business to the market, it is prohibited trading with securities issued by, or referenced to, by the publicly-held company itself, by the direct or indirect controlling shareholders, officers, members of the board of directors, supervisory board and any bodies with technical or consulting functions created by means of a statutory provision, or by anyone who, by virtue of their office, function or position in the publicly-held company, its parent company, its subsidiaries or affiliates, have knowledge on the information related to the relevant act or fact

§1 The same prohibition applies to anyone who has knowledge on the information referring to a relevant act or fact, knowing that it refers to information not yet disclosed to the market, in particular to those who have a business, professional or trust relationship with the company, such as independent auditors, securities analysts, consultants and institutions that are part of the distribution system, which are responsible for verifying the disclosure of information before trading with securities issued by the company or referenced to them.

§2 Without prejudice to the provisions of the previous paragraph, the prohibition provided for in the caput also applies to administrators who leave the company's management before the public disclosure of business or fact initiated during its management period, and will extend for a period of six months after his/her withdrawal.

§3 The prohibition provided for in the caput shall also prevail:

I – if there is an intention to promote incorporation, total or partial spin-off, merger, transformation or corporate reorganization; and

II – in relation to the direct or indirect controlling shareholders, officers and members of the board of directors, whenever the acquisition or sale of shares issued by the company by the company itself, its subsidiaries, affiliates or another company under common control is in progress,

or if an option or term has been granted for the same purpose.

§ 4 Trading by the people mentioned in the caput is also prohibited for a period of fifteen (15) days prior to the disclosure of the quarterly (ITR) and annual (DFP) information on the company, with the exception of the provisions of § 2 of art. 15-A.

(...)

§ 7 The prohibitions provided for in the caput and §§1 to 3 does not apply to trading carried out by the public-held company itself, the direct or indirect controlling shareholders, officers, members of the board of directors, audit committee and any bodies with technical or consulting functions created by means of a statutory provision, according to the procedures provided for in art. 15-A.

- j. Day-trade;
- k. Any operation made on behalf of third parties for their own benefit, direct or indirect.

**5. Holding period**

- a. 90 days, including operations (investments and redemptions) with single-share investment funds.
- b. The holding period does not apply to those assets listed in the topic "Operations without the need for prior authorization"

**6. Statements**

- a. I hereby declare that I agree with the terms of this policy and that my personal investments are currently in compliance with said terms.
- b. I authorize the Alaska's Compliance Officer to have access to my investments made with BTG, in line with this policy.

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**Name:**

**CPF:**