

**POLICY OF USE OF INFORMATION AND DISCLOSURE OF MATERIAL ACT OR FACT AND OF
TRADING OF SECURITIES**

1. PURPOSE

1.1. This Policy of Disclosure of Information and of Trading with Securities of Ecorodovias Infraestrutura e Logística S.A. aims to regulate the disclosure of information on a material act or fact, the negotiation of securities pending a material act or fact not disclosed and the disclosure of information on the trading of securities issued by the Company, ensuring the best possible symmetry in the dissemination of information.

2. APPLICABILITY

2.1. This Policy applies to the Controlling Shareholder, to the members of the Senior Management, including those who depart from the board of directors, to the other Management Bodies, Relevant Employees, third parties hired by the Company and persons who, by virtue of their position, function or office in the controlling companies, in the controlled companies or in the related companies, are aware of the Company's Material Act or Fact.

3. TERMS AND DEFINITIONS

3.1. For the purposes of this Policy, the terms below will be defined as follows:

- Controlling Shareholder means the controlling shareholder(s) of the Company.
- Senior Management means the Board of Directors, the Statutory Board of Officers and the Advisory Committees.
- Material Act or Fact means, pursuant to Article 155, § 1, the Brazilian Corporate Law and Article 2 of CVM Resolution No. 44/21, any decision of the controlling shareholder, resolution of the general meeting or the management bodies of the publicly held company, or any other act or fact of a political-administrative, technical, negotiation or economic-financial nature that occurred or related to its business that may influence in a significant manner: (i) in the quotation of securities issued by the Company or referenced thereto; (ii) in the decision of investors to buy, sell or hold those securities; or (iii) in the decision of investors to exercise any rights inherent in the condition of holder of securities issued by the Company or referenced thereto.
- B3 means B3 S.A. – Brasil, Bolsa, Balcão.

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- Employees means every person with an employment relationship with the Company, as well as interns and young apprentices.
- Relevant Employees means whoever, by virtue of the position, function or office exercised in the Company, in the Controlling Shareholder, the Company's related or controlled companies, is aware of, or may become aware of, a Material Act or Fact about the Company's corporate business not yet disclosed to the market, or also related to the Company's quarterly and annual financial statements that have not yet been disclosed to the market.
- Advisory Committees mean the People Management and Governance Committee, the Investment, Finance and Risk Committee, the Audit Committee, and the other advisory committees created or established by the Board of Directors.
- Company or Ecorodovias means Ecorodovias Infraestrutura e Logística S.A.
- Board of Directors means the Company's board of directors.
- Fiscal Council means the Company's fiscal council.
- CVM means the Brazilian Securities and Exchange Commission.
- Other Management Bodies mean the members and their alternates, when applicable, of the Company's Audit Committee, Advisory Committees and any other bodies with technical or advisory functions, created or that may be created by the Company's Senior Management. This Policy also applies to members and their alternates of the Fiscal Council.
- Statutory Board of Officers means the Company's statutory board of officers.
- Brazilian Corporate Law means Law No. 6,404 of December 15, 1976, and its subsequent amendments.
- Company Rules means the set of rules that guide what is or is not permitted by the Company, including the Company's bylaws, policies, procedures, employment contracts, among others.
- Persons Subject to the Policy mean the Controlling Shareholder, the members of the Senior Management, including those who depart from the board during the period of six months from the date of removal, the Other Management Bodies, the Relevant Employees, third parties hired by the Company and persons who, by virtue of their

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position, function or office in the controlling companies, in the controlled companies or related companies, are aware of the Company's Material Act or Fact.

- CVM Resolution No. 44/21 means Resolution No. 44 of August 23, 2021, issued by CVM.
- Adhesion Term means the adhesion term contained in Annex I to this Policy.
- Prohibition to Trading means the prohibition described in item 12.1 of this Policy.

4. POLICY MANAGEMENT

4.1. The Company's Investor Relations Officer is the person responsible for the execution and follow-up of this Policy.

5. RELEVANT ACT OR FACT

5.1. "Material Act or Fact" constitutes, pursuant to Article 155, § 1 of the Brazilian Corporate Law and Article 2 of CVM Resolution No. 44/21, (a) any decision of the controlling shareholder(s), resolution of the general meeting or the company's management bodies; or (b) any other political-administrative act or fact, technical, business or economic-financial event occurred or related to its business that may influence in a significant manner:

- (a) in the quotation of the Securities;
- (b) investors' decision to buy, sell or hold the Securities; or
- (c) investors' decision to exercise any rights inherent in the status of Securities' holders.

5.2. The Material Acts or Facts are exemplified in Article 2 of CVM Resolution No. 44; however, the verification of their occurrence should always consider their materiality in the context of the activities and the joint dimension of the Company and its subsidiaries (together, "Ecorodovias Group"), considering the potential that certain information has to affect the quotation and investment decisions related to the Securities.

6. GENERAL RULES AND PROCEDURES FOR THE DISCLOSURE OF RELEVANT FACTS

6.1. Responsibilities

It is the responsibility of the Investor Relations Officer, pursuant to CVM Resolution No. 44/21, in addition to the other obligations provided for in this Policy, to:

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(i) send to CVM, through an electronic system available on the CVM's website on the worldwide computer network, and, if applicable, to the market management entities in which the securities issued by the Company are admitted to trading ("Organized Markets"), any Material Act or Fact occurred or related to its business;

(ii) ensure its wide and immediate dissemination, simultaneously in all markets where such securities are admitted to trading, as well as to the investor public in general; and

(iii) disclose simultaneously to the relevant Act or Fact market through the page on the Company's worldwide computer network, Portal de Notícias do Valor, ri.ecorodovias.com.br, and the system for sending periodic and occasional information from CVM (IPE System).

6.2. The Managers, members of the Fiscal Council and Members of Committees shall communicate any Material Act or Fact that they are aware of to the Investor Relations Officer, in order for him/her to take the appropriate measures.

6.3. In the event that the Investor Relations Officer omits himself/herself in the performance of his/her duty to communicate and disclose material acts or fact, in compliance with the assumptions of confidentiality provided for in this Disclosure Policy, the controlling shareholders, Managers, members of the Fiscal Council and Members of Committees that have personal knowledge of the Material Act or Fact and verify such omission, shall immediately communicate the Material Act or Fact to CVM.

6.4. It is the duty of the Company, in the person of the Investor Relations Officer of the Company, in addition to the other obligations provided for in this Policy, to maintain at its headquarters, at the disposal of the CVM, list with updated relationship of the Persons Subject to the Policy, as well as those persons who violate this Policy, and their qualifications, indicating position or function, address and registration number in the Brazilian Taxpayer's Registry of Legal Entities (CNPJ) or in the Brazilian Taxpayer's Registry of Individuals (CPF).

6.5. It is the duty of the Company's Ethics Committee to analyze the cases of violation received through the Company's Ethics Channel, and to decide on the need to apply disciplinary measures in accordance with this Policy and other Company's Rules.

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Moment of Disclosure of the Material Act or Fact

6.6. The Investor Relations Officer shall disclose the Material Act or Fact immediately after its occurrence and simultaneously to the entire market, CVM, B3 and Organized Markets.

6.7. The disclosure of a Material Act or Fact shall take place, whenever possible, before the start or end of business in B3 and, if applicable, in other Organized Markets.

6.8. If the disclosure of the Material Act or Fact occurs before the beginning of the business in the Brazilian market in which the Securities issued by the Company are traded, such disclosure must occur at least 30 minutes before the opening of the trading session, preferably observing the interval of one hour in advance of the beginning of the negotiations.

6.9. In case of incompatibility of schedules, the opening hours of the Brazilian market will prevail.

6.10. If it is exceptionally imperative that the disclosure of the Material Fact occurs during trading hours, the Investor Relations Officer shall contact the Board of Issuers of B3 (*Diretoria de Emissores da B3*), prior to the disclosure and communication of the Material Fact, in order to suspend the trading of Securities, in accordance with the B3 Issuers Manual (*Manual de Emissores da B3*).

Form of Disclosure of the Material Act or Fact

6.11. The disclosure of a Material Act or Fact must occur through: (i) the sending of the information to the periodic and any information system, on the Internet, CVM and B3; (ii) the provision of information on the *Portal de Notícias do Valor*; and (iii) the Company's e-mail address on the worldwide computer network - www.ecorodovias.com.br/ri.

7. EXCEPTION TO THE DUTY OF IMMEDIATE DISCLOSURE OF THE ACT OR MATERIAL FACT

7.1. The Material Act or Fact may, exceptionally, cease to be disclosed if the Controlling Shareholder or the members of the Senior Management believe that its disclosure will jeopardize the company's legitimate interest, as provided for in Article 6 of CVM Resolution No. 44/21, and it being stated that this exception will immediately cease to be in force in the event that the information escapes control or if there is an

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atypical fluctuation in the quotation, negotiated price or quantity of the securities issued by the company or referenced thereto.

8. DUTY TO KEEP IT CONFIDENTIAL

8.1. Persons Subject to the Policy who have access to a material act or fact or any other person who, by virtue of their position, function or office, has access to a material act or fact, shall have the duty to: (i) keep confidential the information relating to a Material Act or Fact to which they have privileged access until their disclosure to the market; and (ii) ensure that Employees and third parties also do so, responding jointly and severally with them in the event of non-compliance with the duty of confidentiality. Whenever there is doubt about the relevance of a material act or fact, the Company's Investor Relations Officer shall be contacted in order to clarify this doubt.

9. INFORMATION ON THE OWNERSHIP OF SECURITIES

9.1. The Directors, members of the Fiscal Council and Members of Committees shall inform the Investor Relations Officer of the Securities of their ownership and the negotiations with Securities, as well as of their controlled companies or controlling shareholders who are publicly traded companies, *whether (i) in their own name, of their (ii) spouse, from whom he/she is not legally separated, (iii) dependent partner included in the annual income tax return.*

9.1.1. The Investor Relations Officer shall forward to CVM, B3 and, if applicable, the Organized Markets, the information referred to in item 9.1 above with respect to the Securities traded by the persons referred to in item 8.1 and by the Company itself.

9.1.2. The communication shall be made by the respective holders:

- (a) immediately after the investiture in office, and
- (b) within a maximum period of ten (10) days after the end of the month in which the positions held change, indicating the balance of the position in the period.

10. INFORMATION ON THE ACQUISITION OR DISPOSAL OF RELEVANT EQUITY INTEREST

10.1. Controlling Shareholders, and shareholders who elect members of the Board of Directors or of the Fiscal Council, as well as any natural or legal person, or group of persons, acting jointly or representing the same interest, who conduct relevant negotiations shall communicate to the Investor Relations Officer about the acquisition

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or disposal of shares through which relevant shareholding is reached, immediately after such participation has been achieved.

- 10.1.1. The Relevant Shareholding is the direct or indirect participation, at levels of 5% (five percent), 10% (ten percent), 15% (fifteen percent), and so on, of a kind or class of shares representing the company's capital and of a publicly-held company.
- 10.1.2. The Investor Relations Officer shall disclose the information highlighted above, as soon as received by the Company, to CVM, B3 and other Organized Markets.

11. SECURITIES TRADING POLICY

11.1. In order to ensure adequate trading standards with securities issued by the Company, it is adopted the system that all negotiations by the Company itself and the persons who adhere to this Policy will only be carried out with the intermediation of brokers.

12. PROHIBITIONS TO TRADING

12.1. It is forbidden to the Company itself, the Controlling Shareholders, members of the Board of Directors and the Fiscal Council, Members of Committees, Statutory Officers, employees and non-statutory executives of the Company, as well as those who have a commercial, professional relationship with the Company and who have access to the relevant information, conduct transactions with Securities or provide such information to third parties who do not need to be aware of it, as long as they have knowledge of a Material Act or Fact that has not yet been disclosed.

12.2. The prohibition to trading with Securities provided for in item 12.1 above must be observed until the disclosure of Material Act or Fact.

12.3. It is also prohibited to the persons indicated in item 12. 1 above to carry out transactions with Securities:

- (a) from the moment of biggening of studies or analysis of mergers, total or partial division, consolidation, transformation, or any form of corporate reorganization or business combination, change in control of the Company, including through the conclusion, amendment or termination of shareholders' agreements, decision to promote the cancellation of registration of the publicly-held company or change of the environment or trading segment of the shares of its issue;

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(b) from the moment studies or analyses of the request for judicial or extrajudicial recovery and bankruptcy made by the Company itself have begun;

(c) in relation to the Controlling Shareholders and Managers, whenever the acquisition or disposal of shares issued by the Company itself, its subsidiaries or other company under common control, is ongoing, or if an option or mandate has been granted for the same purpose;

(d) in periods in which there is determination of non-trading by means of communication of the Investor Relations Officer, being certain that the said abstention will last until a new notice is released expressly stating its final term ("**Additional Prohibition Period**").

12.4. In case of trading of shares by the Company itself, pursuant to item 12.3 (c) above, the Controlling Shareholders and Managers may conduct transactions with Securities, provided that the applicable rules in force (including that of non-trading in possession of a Material Act or Fact not yet disclosed) are observed, on the dates on which the Company is not carrying out the repurchase transaction. To this end, the Investor Relations Officer shall inform the Persons Subject to the Policy the following dates in which the Company may perform such operations.

12.5. The limits also apply to former Managers who depart from the Company's management prior to the disclosure of a Material Act or Fact, observing that, pursuant to CVM Resolution No. 44, the Managers who departs from the Company with relevant information and it has not yet been disclosed, if he/she is using such information if he negotiates securities issued by the Company within three (3) months of its termination.

12.6. The prohibition provided for in item 12.1 of this Trading Policy do not apply:

(a) to cases of acquisition, through private negotiation, of shares that are in treasury, resulting from the exercise of a purchase option in accordance with a stock option grant plan approved at a general meeting, or when it comes to the granting of shares to managers, employees or service providers as part of remuneration previously approved at a general meeting;

(b) negotiations involving fixed income securities, when carried out through transactions with combined repurchase commitments by the seller and resale by the buyer, for settlement on a pre-established date, before or equal to the maturity of the securities subject to the transaction, carried out with predefined profitability or remuneration parameters; and

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(c) subscriptions of new securities issued by the Company, without prejudice to the incidence of the rules available on the disclosure of information in the context of the issuance and offer of such securities.

12.7. In no event will any communication by the Investor Relations Officer exempt the Persons Subject to the Policy from their legal and regulatory obligation to refrain from trading Securities at all periods in which there is legal or regulatory provision to do so.

12.7.1. The Investor Relations Officer shall substantiate the decision in which he/she determines the Additional Prohibition Period, in view of the proper care with the maintenance of the confidentiality of the information he/she is safeguarding.

13. PROHIBITION TO TRADING IN THE PERIOD PRIOR TO DISCLOSURE OF QUARTERLY AND ANNUAL INFORMATION

13.1. The Controlling Shareholder, the members of the Statutory Executive Office, the members of the Board of Directors and the Fiscal Council are prevented from any negotiation with the securities issued by the Company, or referenced thereto, within fifteen (15) days prior to the date of disclosure of the Company's quarterly accounting information and annual financial statements, regardless of the knowledge, by such persons, of the content of the quarterly accounting information and the Annual Financial Statements of the Company, subject to the provisions of § 2 of Art. 16 and without prejudice to the provisions of Article 13 of CVM Resolution No. 44/21, and its amendments. The accountability of the term shall be made excluding the day of disclosure, however securities deals may only be carried out on that day after such disclosure.

13.2. The Company's Investor Relations Officer shall inform in advance the Persons Subject to the Policy who are aware of information relating to the Company's Material Act or Fact, about the dates of disclosure or publication indicated above, for the purposes of compliance with the period of fifteen (15) days of the Prohibition to Trading. However, the lack of such communication will not exempt the Persons Subject to the Policy from their legal and regulatory obligation to refrain from trading securities of issuance of the Company and, if any, derivatives referenced thereto, in all periods provided for in the regulations and legislation in force in which there is determination of non-negotiation.

13.3. The limits provided for in item 12.1 shall cease to apply as soon as the Company discloses the relevant fact to the market or after the periods provided for in

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the regulations and legislation in force, unless the negotiation with the securities may interfere with the conditions of said business, to the detriment of the Company's shareholders or itself.

13.4. The prohibition provided for in item 12.1 does not apply to: (i) negotiations involving fixed income securities, when carried out through transactions with combined repurchase commitments by the seller and resale by the buyer, for settlement on a pre-established date, before or equal to the maturity of the securities subject to the transaction, carried out with predefined profitability or remuneration parameters; (ii) transactions intended to meet obligations assumed before the beginning of the prohibition period arising from securities loans, exercise of options for the purchase or sale by third parties and fixed-term purchase and sale agreements; and (iii) negotiations carried out by financial institutions and legal entities that are members of their economic group, provided that they are carried out in the normal course of their business and within the parameters of this Policy.

14. GENERAL RULES

14.1. The trade restrictions and prohibitions provided for in this Trading Policy apply:

- (a) to any securities, admitted or not to trading on B3 or Organized Markets; and
- (b) loan operations with shares issued by the Company.

14.2. The trading restrictions and restrictions provided for in this Trading Policy do not apply to transactions carried out by investment funds of which The Persons Subject to The Policy are quotaholder, provided that they are not exclusive investment funds or investment funds whose trading decisions of the administrator or portfolio manager are directly influenced by the Subject to the Policy.

14.3. Persons Subject to the Policy shall ensure that those with whom they have a business, professional or trust relationship do not trade Securities when they have access to undisclosed Relevant Acts or Facts.

TRADING RESPONSIBILITIES

14.4. It is the duty of the Statutory Board of Officers, in addition to the other obligations provided for in this Policy, to indicate the persons who must formally adhere to the Policy, according to the guidelines of the investor relations sector.

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14.5. It is the duty of the Company, in addition to the other obligations provided for in this Policy, to formally communicate the terms of this Policy to the persons subject to it, obtaining the respective formal adhesion in an instrument that must be filed at the Company's headquarters, for as long as the person maintains a relationship with the Company, and for at least 5 years after dismissal.

14.6. It is the duty of the Company's Investor Relations area, in addition to the other obligations provided for in this Policy, to:

- (i) maintain control of the monthly movement of the shareholding position carried out by the Controlling Shareholder, members of the Senior Management, members of the Other Management Bodies and Relevant Employees;
- (ii) make best efforts to control the movement of securities of the Persons Subject to the Policy;
- (iii) report to the Company's Ethics Committee, using the Ethics Channel, the identified cases of violation of this Policy.

14.7. It is the duty of all Relevant Employees, in addition to the other obligations provided for in this Policy to sign the Adhesion Terms prior to trading with the Company's securities, forwarding it to the Investor Relations sector for due filing.

15. LOAN OF SHARES ISSUED BY THE COMPANY

15.1 Subject to any changes in the applicable regulations and/or consolidation of a miscellaneous understanding by CVM and/or B3 S.A. – Brasil, Bolsa, Balcão, this Policy will apply in full to loan transactions with shares issued by the Company that may be carried out by Persons Subject to the Policy, which shall be registered with BTC Securities Bank (*Banco de Títulos BTC*), provided by B3 through an electronic system, and observe the procedures established by B3, being forbidden any stock loan operation outside the BTC Securities Bank, unless expressly authorized by the Investor Relations Officer.

16. VIOLATION OF POLICY

16.1. Any Person Subject to the Policy who is aware of the violation of any terms of the Policies shall report this to the Ethics Channel.

16.2. Failure to comply with this Policy will subject the infringer to disciplinary sanctions, in accordance with the Company's Rules and those provided for in this item, without prejudice to the administrative, civil and criminal penalties applicable:

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(i) To the Persons Subject to the Policy the sanctions deliberated by the Ethics Committee of the Company will be applicable, which may vary from warning to dismissal for just cause;

(ii) the infringement committed by any of the Persons Subject to the Policy will characterize contractual default, and the Company may, without any charge, terminate the respective contract and demand payment of the fine established therein, without prejudice to losses and damages; and

(iii) when the infringement is serious, the Company's Ethics Committee, without prejudice to its duties, will refer the case to the Board of Directors.

17. TRAINING

17.1. Training should be underway for the engagement and awareness of Persons Subject to the Policy, in order to guide compliance with the guidelines.

18. GENERAL PROVISIONS

18.1. It will be up to the Investor Relations Officer to institute rules and procedures complementary to the provisions of this Policy, with regard to trading with Securities, in particular for the purpose of disciplining, as applicable, the manner in which the application of the rules for trading with Securities will be initiated to persons linked from the beginning of this Policy.

18.2. Any change to this Policy must be communicated to CVM and B3. The Policy may not be amended when pending a Material Act or Fact not yet disclosed.

19. APPROVAL AND VALIDITY

19.1. This Policy was approved at a meeting of the Board of Directors held on March 24, 2022 and enters into force on this date.

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ANNEX I – ADHESION TERM

Policy of Use of Information and Disclosure of Material Act or Fact and Trading of Securities issued by Ecorodovias Infraestrutura e Logística S.A.

By this instrument, [DENOMINATION AND FULL QUALIFICATION], hereinafter simply called “**Declarant**”, as [PERSONS CITED IN CHAPTER II OF THIS POLICY] of ECORODOVIAS INFRAESTRUTURA E LOGÍSTICA S.A., with headquarters at Rua Gomes de Carvalho, 1510, Conjuntos 31/32, Municipality of São Paulo, State of São Paulo, registered in the Brazilian Taxpayers’ Registry of the Ministry of Economy under no. 04.149.454/0001-80, hereinafter simply referred to as “**Company**”, hereby declares to have full knowledge of the rules contained in the Policy of Use of Information and Disclosure of Material Act or Fact and Trading of Securities Issued by Ecorodovias Infraestrutura e Logística S.A., prepared in accordance with CVM Resolution No. 44 and New Market Regulation and approved by its Board of Directors on [•], whose copy he/she/it has received [including its subsequent and eventual changes], obliging to guide his/her/its actions related to the Company always in accordance with such rules.

He/She/It also states that he/she/it is aware that the violation of the provisions of this Policy constitutes a serious offense, for the purposes provided for in Paragraph 3 of Article 11 of Law No. 6,385/76.

The Declarant signs this Term in three (3) counterparts of equal tenor and content, in the presence of the 2 (two) undersigned witnesses.

São Paulo, [•] [•], 20[•].

[DECLARANT]

Witnesses:

1. _____

2. _____

Name:

RG (ID):

Name:

RG (ID):