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MÉLIUZ S.A. RELATED PARTY TRANSACTIONS AND CONFLICTS OF INTEREST POLICY

CHAPTER I - DEFINITIONS

1.1. Unless defined otherwise in this Policy, the terms commencing with a capital letter, whether in the singular or plural, masculine or feminine, shall have the following meanings:

"Directors and Officers" means the members of the Board of Directors, Executive Officers, and members of the Company's Advisory Committees, statutory and non-statutory, and their respective alternates, as applicable.

"Personnel" means every person who maintains a statutory or employment relationship with the Company and its Subsidiaries, such as: Directors and Officers, full-time and temporary employees, outsourced employees, interns, consultants, advisors, and other collaborators of the Company and its Subsidiaries.

"Company" means Méliuz S.A.

"Market Conditions" has the meaning ascribed to it in Section 4.1.

"Conflict of Interest" has the meaning ascribed to it in Section 6.1.

"Subsidiaries" means the subsidiaries and/or entities over which the Company exercises Control Power.

"CVM" means the Comissão de Valores Mobiliários (Brazilian Securities and Exchange Commission).

"Annual Certification" means a document annually signed by the Company's Directors and Officers and Personnel that confirms the absence of participation in any transaction subject to a Conflict of Interest, as provided in this Policy, in the form of Exhibit II hereto.

"Executive Board" means the Company's executive board, as provided in its Bylaws.

"Corporate Governance" means a system consisting of principles and recommendations involving the relationships among the Company, shareholders, Directors and Officers, Personnel, and other stakeholders, aimed at preserving and optimizing the Company's long-term economic value, facilitating its access to resources, and contributing to the quality of the organization's management, its longevity, and the common good.

"Brazilian Corporate Law" means Law No. 6,404, dated December 15, 1976, as amended.

"Related Parties" has the meaning ascribed to it in Section 3.1.

"Policy" means this Related Party Transactions and Conflicts of Interest Policy of the Company and its Controlling Entities.

"CPC Technical Pronouncement No. 05 (R1)" means a pronouncement issued by the Accounting Pronouncements Committee (Comitê de Pronunciamentos Contábeis) and approved by the CVM through CVM Resolution No. 94/2022.

"Statement of Adherence" means the statement of adherence regarding this Policy, in the form of Exhibit I hereto.
"Related Party Transaction" has the meaning ascribed to it in Section 5.1.

"CVM Resolution No. 94/2022" means CVM Resolution No. 94 of May 20, 2022.

CHAPTER II – PURPOSE AND APPLICATION

2.1. This Policy aims to establish rules to ensure that: (i) decisions involving Related Party Transactions and potential Conflicts of Interest are always made in view of the interests of the Company and its Subsidiaries, as well as its Shareholders; and (ii) decisions that may confer a private benefit to any of its Directors and Officers and/or Personnel, family members, entities, or persons related to them, are made transparently, with total integrity, always respecting the Company's best interests, observing the best Corporate Governance practices.

2.2. This Policy seeks to create behaviors and conducts that meet the requirements of current legislation, especially regarding the duty of transparency, loyalty, and integrity of the Directors and Officers and the Personnel, requiring that the Company's interests always prevail over the personal interests of its decision-makers. Thus, in the event of an actual or potential Conflict of Interest situation involving a Director and Officer or Personnel of the Company, such person must promptly report the situation to the Board of Directors and/or to the other Directors and Officers, and shall be disqualified from proceeding with and mediating the transaction in question.

CHAPTER III – RELATED PARTIES

3.1. The following are considered "Related Parties" for the purposes of this Policy, for example:

(i) natural or legal persons with whom the Company may contract under conditions other than the arm's-length independence that characterizes transactions with third parties unrelated to the Company, pursuant to the regulation and/or guidance of regulatory bodies;

(ii) any natural or legal person that, directly or indirectly, through one or more intermediaries, controls, is controlled by, or is under common control with the Company;

(iii) any natural or legal person who has an interest in the Company or who has significant influence over the Company;

(iv) any natural or legal person who has joint control over the Company;

(v) any natural or legal person that is an affiliate of the Company;

(vi) any natural or legal person that is an investee of the Company;

(vii) any natural or legal person who has authority and/or responsibility for the planning, direction, and control of the Company's activities, directly or indirectly, including any Director and Officer; and

(viii) any natural person who is a close family member of or related to any person referred to in the paragraphs above, with close family members being understood as those who may influence or be influenced by that person in their dealings with the Company, including: (a) their spouse or domestic partner and children; (b) children of their spouse or domestic partner; and (c) their dependents or those of their spouse, and family members up to the third degree of consanguinity.

3.2. The definition and examples mentioned in this Policy are non-exhaustive and do not limit the aspects to be considered in identifying Related Parties, nor do they restrict the information subject to disclosure.

CHAPTER IV – MARKET CONDITIONS

4.1. For the purposes of this Policy, "Market Conditions" are considered to be those conditions for which the following aspects were observed during negotiation:

(i) competitiveness: prices and conditions of services or products comparable to those generally practiced in the market;

(ii) compliance: adherence of the services rendered or products involved to the contractual terms and responsibilities practiced by the Company;

(iii) transparency: adequate reporting of the agreed-upon conditions with due application, as well as their impacts, in the Company's financial statements; and

(iv) equity: equal treatment and observance of practices that prevent discrimination or privilege or the use of insider information or business opportunities for individual benefit.

CHAPTER V – RELATED PARTY TRANSACTIONS

5.1. According to CPC Technical Pronouncement No. 05 (R1), "Related Party Transactions" are defined as the "transfer of resources, services, or obligations between a reporting entity and a related party, regardless of whether a price is charged in return."

5.2. The Company may contract with Related Parties provided that it strictly uses the same rules and criteria applicable to the selection and hiring of independent service providers and provided that Market Conditions are observed, as specified in Section 4.1 of this Policy.

5.3. If there is no market parameter, Related Party Transactions must be based on similar preceding negotiations.

5.4. The Company's Executive Board is responsible for identifying Related Parties and classifying operations as Related Party Transactions, pursuant to applicable laws and regulations.

CHAPTER VI – CONFLICT OF INTEREST

6.1. For the purposes of this Policy, "Conflict of Interest" consists of a Related Party's involvement in a decision-making process where they are not in a position of commutativity and independence, having the power to influence the final result and secure a gain for themselves, a family member, or a third party with whom they are involved, or any other situation that may interfere with their capacity for impartial judgment. Decisions where the personal objectives of the Company's decision-makers, for any reason, are not aligned with the Company's objectives shall also be considered Conflicts of Interest.

6.2. If a matter involving Related Parties is identified, the Company's Directors and Officers or Personnel involved must disclose their potential Conflict of Interest regarding the said matter, excuse themselves from discussions on the topic, and abstain from voting on the respective matter.

6.3. If requested by the Company's Chief Executive Officer, as the case may be, the Directors and Officers involved may partially participate in the discussion to provide further information about the Related Party Transaction and the Related Parties themselves. In any event, such Directors and Officers must absent themselves from the voting process on the matter.

6.4. The disclosure of the Conflict of Interest situation and the subsequent abstention from discussion and voting on the said matter must be recorded in the minutes of the resolution or meeting where the situation is presented.

6.5. If any Director and Officer or Personnel who may have a potential private gain arising from a decision fails to disclose their Conflict of Interest, any third party who becomes aware of the situation may do so.

6.6. Annually, the Directors and Officers and Personnel must sign the Annual Certification, in the form of Exhibit II hereto, attesting to the observance of the provisions of this Policy and confirming the absence of participation in any transaction subject to a Conflict of Interest.

CHAPTER VII – APPROVAL AUTHORITY

7.1. The Board of Directors shall be responsible for approving any Related Party Transaction or set of Related Party Transactions, especially when involving an Executive Officer or Director of the Company, except for transactions (a) between the Company and its affiliated companies; or (b) direct and indirect Subsidiaries of the Company, in the ordinary course of their business.

CHAPTER VIII – TRANSPARENCY AND DISCLOSURE OBLIGATION

8.1. The Company must disclose the Related Party Transactions with sufficient details for the identification of the Related Parties and of any essential or non-strictly commutative conditions inherent in the transactions in question, thus ensuring the market the ability to monitor and follow the Company's management actions, even if not yet consummated, in accordance with article 247 of the Brazilian Corporate Law and CVM Resolution No. 94/2022.

8.2. The disclosure of such information must be carried out clearly and precisely, in the explanatory notes to the Company's quarterly and annual financial statements, in accordance with applicable accounting principles, as well as in the Company's Reference Form.

8.3. The Company's suppliers, through a specific contractual clause contained in the agreements executed with the Company, must state that they are aware of, respect, and agree with this Policy.

8.4. Related Party Transactions must be formalized through a written instrument, with due indication of the object of the transaction, amounts involved in the deal, terms and fees charged, if applicable, as well as the other rights and responsibilities of the parties involved.

CHAPTER IX – GENERAL PROVISIONS

9.1. Non-compliance with the provisions of this Policy will result in the determination of liability and the application of administrative sanctions in accordance with the Company's internal regulations.

9.2. The first version of this Policy was approved at the Company's Board of Directors Meeting held on September 1, 2020. This current version, revised by the Company, was approved by the Board of Directors on May 12, 2026, and shall enter into force on the date of its resolution for an indefinite period.

9.3. The full content of this Policy shall be disclosed by the Company on its investor relations website (ri.meliuz.com.br) and on the CVM website (www.cvm.gov.br).

EXHIBIT I

MÉLIUZ S.A. RELATED PARTY TRANSACTIONS AND CONFLICTS OF INTEREST POLICY

STATEMENT OF ADHERENCE

By this instrument, [full name and qualification], hereinafter referred to simply as the "Declarant," in the capacity of [position] of Méliuz S.A., with headquarters at Rua José Versolato, nº 111, ZIP Code: 09750-730, in the City of São Bernardo do Campo, State of São Paulo, registered with the CNPJ/ME under No. 14.110.585/0001-07 ("Company"), hereby, through this Statement of Adherence, (i) declares having received a copy of the Company's "Related Party Transactions and Conflicts of Interest Policy" and having full knowledge of the rules contained therein, which was prepared in accordance with the Novo Mercado Listing Rules of B3 S.A. – Brasil, Bolsa, Balcão, as amended and approved by the Company's Board of Directors on May 12, 2026; and (ii) undertakes to guide its actions concerning the Company always in compliance with such "Related Party Transactions and Conflicts of Interest Policy" and the applicable laws and regulations.

The Declarant further declares having knowledge that the transgression of the provisions of this Policy constitutes a serious infraction for the purposes set forth in § 3 of article 11 of Law No. 6,385, dated December 7, 1976, as amended.

The Declarant executes this Statement in the presence of the 2 (two) undersigned witnesses.

São Bernardo do Campo/SP, [•] day of [•], [•].

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[*DECLARANT*]

Witnesses:

__________________________	__________________________
Name:	Name:
ID No.:	ID No.:

EXHIBIT II

MÉLIUZ S.A. RELATED PARTY TRANSACTIONS AND CONFLICTS OF INTEREST POLICY

ANNUAL CERTIFICATION

By this instrument, [full name and qualification], hereinafter referred to simply as the "Declarant," in the capacity of [position] of Méliuz S.A., with headquarters at Rua José Versolato, nº 111, ZIP Code: 09750-730, in the City of São Bernardo do Campo, State of São Paulo, registered with the CNPJ/ME under No. 14.110.585/0001-07 ("Company"), hereby, through this Annual Certification, reiterates the commitment to comply with the Company's Related Party Transactions and Conflicts of Interest Policy, prepared in accordance with the Novo Mercado Listing Rules of B3 S.A. – Brasil, Bolsa, Balcão, as amended and approved by its Board of Directors on May 12, 2026.

The Declarant further certifies, for all due purposes, that it is not involved in any current transaction that conflicts with the Company's interests.

As an expression of truth, the Declarant executes this Annual Certification in the presence of the 2 (two) undersigned witnesses, for it to produce its effects.

São Bernardo do Campo/SP, [•] day of [•], [•].

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[*DECLARANT*]

Witnesses:

____________________________	____________________________
Name:	Name:
ID No.:	ID No.: