

# **POLICY ON SOCIAL, ENVIRONMENTAL AND CLIMATE RESPONSIBILITY (PSECR)**

**Version 3.**

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## INTRODUCTION

Recognizing our role in supporting the transition to a more sustainable world, integrating environmental, social, corporate governance and climate aspects in our products, services, initiatives and in our work with the market, and with the objective of guiding the efforts of Fênix Distribuidora de Títulos e Valores Mobiliários in relation to these matters, we undertake to adopt, widely disseminate and incorporate into our procedures the present *Policy on Social, Environmental and Climate Responsibility (PSECR)*, representing a common reference for the adoption of actions, strategies and action plans that ensure compliance with the Sustainable Development Goals of the United Nations Global Compact (SDGs).

We know that this is a journey that will be traveled together with our employees, customers, suppliers, partners, the market and society in general. We believe that investments can generate value for society and promote the preservation of the environment. We want to increase knowledge, engagement and the development of concrete solutions so that social, environmental and climate responsibility is at the center of business models and the decision-making process.

This policy is applicable to Fênix DTVM, which undertakes to manage its social, environmental and climate risks and impacts on its business.

The business areas must develop rules and procedures that guarantee compliance with the precepts set forth in this policy.

Omissions will be decided by the FNX Group's Governance and Compliance Committee until the omission is corrected in a new version of this document.

## GOAL

Among the objectives of this Policy, the following stand out:

- Raise awareness and assist in the dissemination of the theme in a clear and accessible way;

- Clarify the main concepts and reinforce the principles of a social, environmental and climate nature applied to our businesses, activities, processes and relationships with interested parties, seeking to prevent and mitigate negative impacts and increase the positive impacts on the environment and society. ;
- Serve as a technical basis for creating procedures for the areas that are based on the principles of relevance, proportionality and other specific internal policies of Fênix DTVM or the FNX Group, to which it belongs.

## **MAIN REGULATORY AND INTERNAL REFERENCES**

Listed below are the main regulatory references that, at the time of preparation of this document, regulate the subject and guide this policy:

- **CMN Resolution No. 4,945/2021** - provides for the Policy on Social, Environmental and Climate Responsibility (PSECR) and actions aimed at its effectiveness;
- **CMN Resolution No. 4,557/2017** - provides for the risk management structure and the capital management structure;
- **BCB Resolution No. 151/2021** - Provides for the submission of information related to social, environmental and climate risks dealt with in Resolution No. 4,557, of February 23, 2017, and CMN Resolution No. 4,945, of September 15, 2021; and
- **BCB Resolution No. 139/2021** – Provides for the disclosure of the Social, Environmental and Climate Risks and Opportunities Report (GRSAC Report).
- **FNX Group Code of Ethics and Conduct** ;
- **FNX Group Sustainability Policy.**

## CLASSIFICATION



**INTERNAL:** the Standards must not be accessed or disseminated outside the FNX Group environment, unless it is analyzed and previously authorized by the Compliance area

## COVERAGE

This policy is applicable to Fênix DTVM, which undertakes to manage its social, environmental and climate risks and impacts on its business through the joint action of its collaborators (shareholders, directors, employees, interns), customers, partners and suppliers.

## ACRONYMS AND DEFINITIONS

All the acronyms and definitions presented below do not remove the need to observe the definitions contained in the governing rules.

**Company or Fênix DTVM** - Fênix Distribuidora de Títulos e Valores Mobiliários to which this policy is applicable;

**PSECR** – Policy on Social, Environmental and Climate Responsibility;

**Internal Community** - Directors, statutory directors, employees, interns and apprentices;

**Stakeholders** - Fênix DTVM's main stakeholders are its internal community, shareholders, customers, suppliers and the community in which it operates, in addition to society in general;

**Environmental Nature** - Preservation and repair of the environment, including its recovery, when possible;

**Climatic Nature** - Positive contributions to the Social, Environmental and Climate Responsibility Policy



**Social Nature** - Respect, protection and promotion of fundamental rights and guarantees of common interest;

**Common Interest** - Interest associated with a group of people legally or factually linked by the same cause or circumstance, when not related to the environmental or climatic nature;

**Activities** - Fênix DTVM's internal processes and practices that may cause social, environmental and climate impact, not to be confused with operations or financial services;

**Proportionality** - The compatibility of this Policy with the business model, the nature of operations and the complexity of Fênix DTVM's products, services, activities and processes;

**Relevance** - The adequacy of this Policy to the dimension and relevance of exposure to social, environmental and climate risks, dealt with in CMN Resolutions No. 4557/2017, No. 4926/2021 and No. 4943/2021;

**Environmental Risk** - Possibility of losses for the institution caused by events associated with the degradation of the environment, including the excessive use of natural resources;

**Climate Risk** - Possibility of losses for the institution caused by events associated with the process of transition to a low-carbon economy, in which the emission of greenhouse gases is reduced or compensated and the natural mechanisms for capturing these gases are preserved ( transition climate risk); and events associated with frequent and severe weather or long-term environmental changes that may be related to changes in weather patterns (physical weather risk);

**Social Risk** - The possibility of occurrence of losses for Fênix DTVM caused by events associated with the violation of fundamental rights and guarantees or harmful acts to common interest.

## **ROLES AND RESPONSIBILITIES**

**Compliance Director** – The Compliance *Director* must provide input and participate in the decision-making process related to the establishment and review of the PSECR, assisting the board of directors; implement actions aimed at the effectiveness of the PSECR; monitor and evaluate the implemented actions; improve the actions implemented, when any deficiencies are identified; and

adequately and reliably disclose the PSECR, the actions implemented with a view to the effectiveness of the PSECR, as well as the criteria for its evaluation; and mandatorily, when existing, a) the list of economic sectors subject to restrictions in the business carried out by the institution due to aspects of a social, environmental or climatic nature; b) the list of products and services offered by the institution that contribute positively to aspects of a social, environmental or climatic nature; c) the list of pacts, agreements or national or international commitments of a social, environmental or climate nature in which the institution is a participant or, as the case may be, its foreign parent company, when this participation involves the Brazilian subsidiary; and d) the mechanisms used to promote stakeholder participation, if included in the PSECR establishment and review process; and, optionally, the evaluation of the actions regarding their contribution to the effectiveness of the PSECR.

**Sustainability Committee** – The Sustainability **Committee** must propose recommendations to the board of directors on the establishment and review of the PSECR; evaluate the degree of adherence of the actions implemented to the PSECR and, when necessary, propose recommendations for improvement; and keep records of these recommendations. As long as the Committee does not exist, the **Compliance Officer** must assume the aforementioned attributions.

**Board of Directors** – The **Board of Directors** must approve and review the PSECR, with the assistance of **the Compliance Officer** and the **Sustainability Committee** ; ensure the institution's adherence to the PSECR and actions aimed at its effectiveness; ensure the compatibility and integration of the PSECR with the other policies established by the institution, including, when existing, credit, human resource management, risk management, capital management and compliance policies; ensure timely correction of PSECR-related deficiencies; establish the organization and attributions of the social, environmental and climate responsibility committee; ensure that the remuneration structure adopted by the institution does not encourage behavior that is incompatible with the PSECR; and promote the internal dissemination of the PSECR and the actions aimed at its effectiveness. While the Board of Directors does not exist, the **Board of Executive Officers** must assume the attributions referred to above.

## 1. PRINCIPLES AND GUIDELINES

**Responsibility** – Fênix DTVM is committed to acting with social, environmental and climate responsibility, directing efforts to collaborate with the economic and social development of the Brazilian market and seeking to contribute positively to mitigating the impacts caused by climate change, considering the specific needs of its businesses, the complexity of the products and services offered, as well as the applicable legal and regulatory aspects.

**Publicity** – The Institution understands that its corporate image depends on the commitment of all those involved in the business to the pursuit of the highest ethical standards. With the dissemination of its values, Fênix DTVM seeks not only to improve internal interaction, but also to maintain solid and transparent relationships with its customers, suppliers and the market in general.

### 1.1. SOCIAL GUIDELINES

We value the promotion of education and diversity in our practices and with all our stakeholders. We pay attention to human rights, repudiating any practice that disrespects these minimum rights of each individual, including, but not limited to, any discriminatory act and, for that, we follow the guidelines included in the Group's Code of Ethics and Conduct.

### 1.2. ENVIRONMENTAL GUIDELINES

We seek to expand our environmental contribution with customers and partners that promote positive impacts on the environment, aiming at its preservation and recovery. In addition, with the aim of minimizing our environmental impact, we seek to guide the activities of our employees, partners and agents within the scope of this policy and other group policies, disseminating and encouraging good practices in our work in the corporate environment and, for this, We follow the following guidelines:

- Incorporate the environmental variable into Fênix DTVM risk analysis and management;



- Reduce the negative impacts of our direct activities, promoting the efficient use of resources, using equipment that allows reducing consumption, management and proper disposal of waste and effluents, as well as the promotion of sustainable practices;
- Comply with the environmental legislation applicable to our activities; and
- Support our customers, employees, suppliers and partners in adopting better environmental practices.

### **1.3. CLIMATE GUIDELINES**

We recognize our responsibility to invest in the transition to a low carbon economy, minimizing its impacts and engaging the entire ecosystem towards this path. We understand that climate change affects society and the economy in unprecedented ways, creating both risks and opportunities. We recognize that an essential part of our purpose of “improving people's lives” involves adopting a responsible posture in relation to the challenge posed by climate change, and to that end, we have adopted the following guidelines:

- Encourage mitigation and adaptation to climate change;
- The promotion of the Sustainable Development Goals of the United Nations Global Compact (SDGs); and
- Incorporate the climate variable into the Fênix DTVM risk analysis and management.

## **2. SOCIAL, ENVIRONMENTAL AND CLIMATE RISK MANAGEMENT**

For us, social, environmental and climate risk is the probability of occurrence of losses arising from exposure to events of this nature related to the company's activities, as well as the possibility of occurrence of losses caused by the materialization of physical risks, including extreme events and alterations chronicles in weather patterns, or transition, including reputational, legal and market risks.

For that, we will:

- Pay special attention to Fênix DTVM's social, environmental and climate risk policies and manuals;
- Consider social, environmental and climate criteria in our risk and criticality analyses, applying restrictions when applicable;
- Identify, classify, assess, monitor, mitigate and control the social, environmental and climate risk present in activities and credit operations;
- Develop a social, environmental and climate risk assessment methodology for Fênix DTVM activities;
- Incorporate social, environmental and climate criteria in internal due diligence processes and in the management and decision on assets over which Fênix DTVM has operational or corporate control;
- Establish and apply criteria for social, environmental and climate risk and ESG in the development of new businesses;
- Continuously improve the guidelines of this Policy according to the evolution of the subject along with market standards, including voluntary commitments adhered to, market indexes and other ESG standards.

### **3. POSITIVE IMPACTS**

We believe that for greater robustness of our social, environmental and climate strategy, adherence to voluntary commitments, programs and national and international pacts is essential. Thus, we seek to strengthen our social, environmental and climate practices in our business decisions and internal practices.

### **4. ROLES AND RESPONSIBILITIES**



It is the responsibility of the Sustainability Committee, together with the executive board, to observe, raise awareness and apply the commitments established in this policy, so that the policy as a whole is applied at Fênix DTVM.

## **5. GOVERNANCE**

Fênix DTVM has corporate governance based on the best market practices, maintaining our entrepreneurial culture with autonomy and independence from strategic and/or operational sectors, as the case may be. It has a specific governance structure for dealing with social, environmental and climate issues in order to disseminate the principles and guidelines set out in this policy.

The institution maintains a governance system with the aim of managing socio-environmental and climate risk. Following are the integral parts of this system.

### **5.1. DIRECTOR IN CHARGE**

Fênix DTVM appointed before the Central Bank of Brazil an officer responsible for compliance with this policy and other decisions related to the subject.

### **5.2. SUSTAINABILITY COMMITTEE**

Sustainability Committee, an advisory body, responsible for advising the Executive Board on matters related to social and sustainable development, including promoting responsible development and other social initiatives. Among the attributions of the Committee is the assessment of the degree of adherence of the actions implemented with a view to the effectiveness of the PSECR;

## **6. DISCLOSURE**

Disclosure and communication about this Policy, as well as its future revisions and relevant initiatives, must reach the various related parties and be attributed in a timely manner, including:

- Disclose in internal communication vehicles whose content is linked to the commitments and practices contained in this policy;
- Publish this policy in the internal policy and guideline management system;
- Make this policy available in an easily accessible and identifiable location on its institutional website;
- Disclose the composition of the Sustainability Committee on the institutional website;

## **7. PERSONAL DATA PROTECTION**

Any procedure based on this policy that involves the processing of personal data must take into account the foundations, principles and rules regarding the rights of holders of personal data provided for in national legislation, as well as good practices related to the subject, taking into account , in particular, but not limited to, the principles of purpose, appropriateness, necessity, quality, safety and non-discrimination.

## **8. GENERAL CONSIDERATIONS**

All employees, without any distinction, must attest to the reading and perfect understanding of this document and its subsequent amendments.

This policy will be reviewed by *Compliance* when required or at least every 2 (two) years. Revision will not necessarily result in a new version of the document.

In situations that do not fit or are in disagreement with this Policy in any way, they must be submitted to *Compliance* , which will analyze the circumstances and grounds and submit them for deliberation by the *Compliance Board* and/or competent Committee.

## 9. VERSION CONTROLS

### CURRENT

### VERSION

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Current version:	3
Sector Responsible for the Policy:	ESG
Approver by:	Vinícius de Mello Pinho – Diretor de GRC
Approval Date (dd /mm/ yyyy ):	03/02/23
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Pages:	14
Attachments:	0

### MAIN CHANGES IN THIS VERSION

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Update of the former Social and Environmental Responsibility Policy (PRSA), previously regulated by CMN Resolution No. 4,327/2014, which provided for the observance of principles of a social and environmental nature, including the express provision of the need to adopt a set of principles and guidelines of a social and environmental nature climate change to be observed by the institution in conducting its business, activities and processes, as well as in its relationship with stakeholders.