

Policy for the Integration of ESG Factors in the Investment Analysis and Decision Process



CTT Group

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In the analysis of investment opportunities, the creation of value for the CTT Group and its shareholders is considered, seeking to make investment decisions that allow the company to have future prospects for growth and generation of results, in assets that have adequate levels of liquidity, and that expose the CTT Group to reduced levels of risk. Thus, the investment decision process seeks as its main objective the best interest for the CTT Group and its shareholders, in the expectation of maximizing the valuation of the CTT Group and allowing it to have liquidity to invest in the innovation, growth and sustainability of its business, and to apply its dividend policy.

Based on this premise, the CTT Group also recognizes the importance of integrating ESG factors in investment decisions and in the development of its business for the creation and sharing of sustainable value with its stakeholders.

The proximity to local communities as a distinctive factor of the CTT Group generates trust between the community and the different organizations of the group, creating long-term bonds. In this sense, the CTT Group sees this policy, including investment in the community, as an instrument for aligning and pursuing the Sustainable Development Goals (SDG).

I. Principles and Purpose

This CTT Group Investment Policy complies with the following principles, as developed in the respective policies, incorporating, from the outset, ESG factors in the decision-making process:

- a) Promotion of quality and innovation as the basis of business competitiveness and sustainability;
- b) Solidarity and Investment in the Community, affecting people and the transport and distribution networks, the retail network and the logistical support of the CTT Group in strengthening the positive social impact of the Company and proximity to the communities;
- c) Protection of the environment and promotion of environmental values, with particular focus on combating climate change;
- d) Promotion and protection of human rights and working conditions;

- e) Ethical and transparent processes;
- f) Consideration of the long-term perspective in the assessment of risks and impacts, including emission reductions.

II. Objectives and Commitments

The CTT Group undertakes to carry out an ESG risk analysis for the purposes of the investment decision, considering, if available, ESG certifications, ratings or risk scoring provided by internal means or independent external entities, taking into account the materiality of the investment, with attention to its impacts, risks and opportunities, and in compliance with the principles of this policy.

In addition, it assumes the following commitments, to be observed within the framework of the responsibilities defined in the matter:

- a) To disclose the principles, policies and regulations that guide its activity, ensuring its pursuit;
- b) To evaluate the assets, projects or companies in which it proposes to invest from the point of view of their ability to contribute to the implementation of the aforementioned principles;
- c) Incorporate into the investment/divestment decision the assessment of positive/negative compliance with the disclosed principles;
- d) To carry out the activity of managing investments, including the exercise of voting rights, in accordance with this policy and the applicable international standards in this area;
- e) Have the means to verify and carry out internal control of compliance with this policy;
- f) Publicly disclose the content of this policy and an overall assessment of its application.

III. Scope: Value Chain and Stakeholders

This policy applies to most of its investment decisions, including the acquisition of majority or minority stakes in other companies, the making of investments, or the costs of implementing restructuring processes, regardless of their nature, physical or financial, or in the case of tangible or intangible assets, depending on materiality.

In exercising its shareholder function,

CTT Group will seek to promote the adoption of this policy or equivalent principles and commitments, ensuring the overall consistency of the policies adopted within the group, so that

companies with their own policies define them in terms no less stringent than those defined directly by CTT Group.

In observing this policy, CTT Group will also consider its external impact, beyond its direct counterparts, on various stakeholders, including the surrounding community, promoting their involvement and value sharing.

Contracted entities considered critical by the CTT Group, as a supplier, partner or other, may also be subject to audit.

IV. References and Safeguards

This Policy observes and promotes compliance with applicable laws and regulations at international, European and national level. The CTT Group aligns its activity with the international standards or initiatives of reference of the United Nations, the Organization for Economic Cooperation and Development and the International Labor Organization and has clear and auditable processes that include its duty of business diligence.

Regarding, in particular, the Policy for the Integration of ESG Factors in the Investment Analysis and Decision Process, the CTT Group's activity is aligned with:

- a) **United Nations 2030 Agenda**, namely with regard to responsible production and consumption (SDG #12) and climate action (SDG #13);
- b) **Organisation for Economic Co-operation and Development (OECD)** Guidelines for Multinational Enterprises, in particular with regard to sustainable development and due diligence;
- c) **G20/OECD 2023 Corporate Governance Principles**, namely those referring to corporate governance support for companies and their investors in decision-making and risk management, in a sustainable manner.

V. Governance: Decision, Execution, Control, and Disclosure

The implementation of this Policy takes place within the framework of CTT Group's internal governance model, under the following terms:

Definition	Board of Directors
Implementation	Board of Directors (if applicable); Executive Committee; area responsible for planning, management and financial control; area responsible for matters related to strategy and business development; and Sustainability Committee
Control	Sustainability Committee
Disclosure	Areas responsible for internal and external communication

VI. Validity and Review

This Policy was approved on 20 March 2025 and is reviewed at least every 2 years.