

May 29, 2025
072/2025-PRE

CIRCULAR LETTER

Listed B3 Participants

Re.: **Market Maker Program Obligation End Postponed only for the Small Cap Index Futures Contract**

To improve the liquidity of the Small Cap Index Futures Contract, we hereby inform you that the end of the obligation for accredited market makers, announced in Circular Letter 172/2024-PRE, dated December 5, 2024, will be put back to **December 12, 2025**.

Market makers that are already accredited may select de-accreditation from the program up until **May 30, 2025** if they do not wish to make market during the newly extended period.

The other characteristics of the program remain unchanged. The rules and procedures of this program are contained in Annexes I, II and III hereto.

If B3 puts back the end of the obligation again, it will publish a Circular Letter containing information on the extended period, changes to the activity parameters, and any other necessary provisions. Market makers will be free to choose whether to continue trading as such until the new date for the end of the obligation or to conclude their accreditation on the date given in this present Circular Letter.

072/2025-PRE

Please note that the end of the accredited market makers' obligation for Options on the Small Cap Index will occur on May 30, 2025. Further information regarding Options on the Small Cap Index is available at www.b3.com.br/en_us/, Products and Services, Trading, Market maker, Programs – Listed, Options, Options on Single Stocks and Options on Indices.

This Circular Letter revokes and fully substitutes the content of Circular Letter 172/2024-PRE, dated December 5, 2024.

Further information can be obtained from the Chief Product and Client Officer's team by telephone on +55 11 2565-6324/7119 or by email at formadordemercadob3@b3.com.br.

Gilson Finkelsztain
Chief Executive Officer

Luiz Masagão Ribeiro Filho
Chief Product and Client Officer

Annex I to CIRCULAR LETTER 072/2025-PRE

Small Cap Index Futures Contract Market Maker Program

Program characteristics

Up to five market makers will be accredited.

B3 may at its sole discretion increase the number of available slots for accreditation, limited to ten slots.

The institutions will be selected in accordance with the order in which the Instrument of Accreditation is sent.

Accreditation procedure

The selected institutions must formalize their accreditation as market makers by signing the Instrument of Accreditation and filing it by the deadline stipulated in this Circular Letter.

Guidance on the procedure for submitting the Instrument of Accreditation (described as Term of Accreditation in the following guide) can be found in the Procedures Guide for Accreditation of Market Makers (Accreditation Guide), available at www.b3.com.br/en_us, Products and Services, Trading, Market Maker, Accreditation.

Institutions that have not yet signed the Market Maker Accreditation Agreement with B3 must follow the procedures set out in items 4, 5 and 6 of the Accreditation Guide.

072/2025-PRE

Timetable

Instrument of Accreditation filed	Accounts registered	Activity starts	Obligation ends
By Jul. 29, 2024	By Jul. 29, 2024	Aug. 5, 2024	Dec. 12, 2025

B3 may assess accreditation applications submitted after the deadlines stipulated herein, provided the delay is duly justified.

The duration of the program may be extended at B3's sole discretion. If the end of the obligation is deferred, B3 will publish a Circular Letter with information on the length of the extension, any changes to the activity parameters, and other necessary provisions. Market makers will be free to choose whether to continue trading as such until the new date for the end of the obligation or allow their accreditation to expire on the date shown above.

Activity parameters

Market makers accredited for this program must enter bids and asks in accordance with the activity parameters defined by B3.

The rules for the mandatory contract months for activity in the program and the respective activity parameters are available in the document Small Cap Index Futures Contract Market Maker Program Rules, available at www.b3.com.br/en_us, Products and Services, Trading, Market maker, Programs – Listed, Futures, Small Cap Future.

Please note that market makers must also trade in the Small Cap Futures Contract Rollover (SM1) of the first with the second contract month during the entire course of the structured transaction. They may request dispensation from the

market making obligation in the rollover, however, in which case they will have no right to the respective benefits from the transactions executed with this product.

For purposes of the rollover of the contract months, the market makers must trade in the first and second contract months up until the 5th (fifth) business day before the expiration date. As of the 4th (fourth) business day before that date, they will not be obliged to trade in the first contract month but must trade in the next two contract months authorized for trading.

The mandatory contract months and selection rules for the market makers activity are available at www.b3.com.br/en_us/, Products and Services, Trading, Market maker, Mandatory series, Futures and Options on Futures.

The activity parameters may be changed during the course of the program in question, with the prior consent of the accredited market makers. B3 will formally advise market makers of any proposals to change the activity parameters. They will have seven business days to respond in writing, and the lack of a timely reply will be taken as consent to the proposed change.

The prior consent of market makers will not be necessary if the parameters are changed owing to atypical market situations that incur a change in trading patterns or adjustments required to avoid the creation of artificial demand, supply or pricing conditions.

Test period

Market makers are entitled to the benefits specified in the "Benefits" item of this Circular Letter without complying with the activity parameters and at the sole

discretion of B3, for up to ten (10) business days after the start of their mandatory activity, in order to conduct connectivity, session and order routing tests, and implement the requisite technological configurations. During the test period, B3 will monitor market makers' activities, and any noncompliance will be rectified.

De-accreditation

In the event of de-accreditation of market makers in this program, B3 may select other institutions that have expressed interest, to replace the de-accredited institutions, following the same accreditation criteria foreseen herein.

Accreditation and de-accreditation of market makers will always be disclosed to participants via B3's usual communication channels, among which the B3 website.

Maximum number of parameter breaches

Any market maker's accreditation under this program may be cancelled in the case of non-compliance with the parameters and/or obligations set forth herein, or in Circular Letter 084/2023-PRE, dated May 30, 2023, regarding the rules for monitoring market maker non-compliance, or in the Agreement of Accreditation for Market Maker Activity, in a way that is either unjustified or whereby B3 does not accept the justification given. The Agreement is available at www.b3.com.br/en_us, Products and Services, Trading, Market maker, Accreditation, Market Maker Agreement.

Minimum activity period

Market makers that withdraw from the accreditation process before starting their activities under the program will not be required to complete the thirty-day minimum period of activity established by Circular Letter 109/2015-DP, dated

October 8, 2015. If they withdraw after starting their activities, they must complete the thirty-day notice period without fail in order for their de-accreditation to be communicated to the market.

Benefits

The accredited market makers will be exempted from paying the exchange fees and other applicable fees on transactions in any contract month of the asset in this program. The exemption will extend to transactions executed with contracts in this program and with equities that comprise the theoretical portfolio of the Small Cap Index or with shares in ETFs that track this index, as long as these transactions have been executed for hedging purposes, in compliance with the criteria and limits defined in the fee policy described in Annex I hereto.

The volume traded in accounts and the assets registered in the program, both for activity in the program and for hedging purposes, is not considered in the daily calculation of day trade for purposes of defining the day trade fee tier for the cash equity market and for the futures market, executed in the other accounts not registered in this program.

Fee benefits in other programs implemented by B3 do not apply to the excess volumes in the accounts registered in this program.

The flow of messages, trades and volumes generated by accredited institutions will be considered for the purposes of the Policy for the Control of Trading Messages, as set forth in Circular Letter 086/2023-PRE, dated May 30, 2023.

General provisions

B3 will resolve any omissions regarding the accreditation process and program to which this Circular Letter refers.

Annex II to CIRCULAR LETTER 072/2025-PRE

Fee Policy for Market Makers in the Small Cap Index Futures Contract (SML)

1. Market maker eligibility conditions

This fee policy applies only to market makers that B3 has accredited for this program and will be conditional upon meeting the requirements below.

2. Fee structure

Market makers accredited for this program are exempted from paying exchange fees and other fees on buys and sells of Small Cap Index Futures Contracts (SML).

3. Exemption on hedge trades

Market makers are also exempted from paying exchange fees and other fees on transactions performed for hedging purposes with equities that are part of the Small Cap Index theoretical portfolio, or with ETF shares that track this index, in accordance with the criteria and limits defined in items 4(a) and 4(b) below for hedge trade exemption.

4. Limits for hedge trade exemption

The market makers will enjoy the hedge trade fee exemption if:

- (a)** the total financial volume of the buys and sells of equities and ETF shares performed for hedging purposes in the account designated for the market maker's activity, in accordance with item (b) below, does not exceed that executed, on one day; and does not exceed the volume of the Small Cap Futures Contract carried to expiration. In this case, we will consider trading in

equities and ETFs executed on the same expiration date as the futures contract and with the same position (buy or sell); and if:

- (b)** the financial volume of buys and sells performed for hedging purposes with each equity in the theoretical portfolio of the reference index is limited to thirty per cent (30%) of the financial volume on the same day; and does not exceed the volume of the Small Cap Futures Contract carried to expiration. In this case, we will consider trading in equities and ETFs executed on the same expiration date as the futures contract and with the same position (buy or sell).

If the market maker exceeds the limits defined in items 4(a) or 4(b) on one or more days, the daily excess futures contracts will be subject to payment of the exchange fees and other fees foreseen in the fee policy described in Annex III hereto.

If both the limits defined in items 4(a) and 4(b) are surpassed on the same day, the exchange fees and other fees will only be charged on the larger excess daily volume.

Please note that exemptions on hedge trades will not consider the buying and selling of equities and of ETF shares in the odd lots market.

Market makers will be responsible for paying the full amount of the exchange fees and other fees on daily excess volumes accumulated in any given month, up until the final business day of the subsequent month.

5. Account for hedge fee exemption

To be eligible for the fee exemption on hedge trades, market makers must designate one specific account exclusively for hedging transactions, regarding the Small Cap Index Futures Contract (SML), regardless of the number of accounts they have for the exercise of their activity.

6. General provisions

Any market maker whose accreditation is cancelled by B3, or which requests de-accreditation before the established date, will cease to be entitled to the exemptions described in this policy as of the cancellation date.

This fee policy does not apply to market makers for other securities admitted to trading on the markets operated by B3.

Annex III to CIRCULAR LETTER 072/2025-PRE

Fees on Excess Day Trade and Excess Non-Day Trade Volumes Applied Exclusively to the Small Cap Index Futures Contract Market Maker Program

1. Segregation of the assets' financial volume for hedging between day trade and non-day trade volume.

1.1. The financial volume traded as a hedge in the designated account is grouped in accordance with the following criteria:

- i)** same trading session date
- ii)** same clearing member
- iii)** same participant code (carrying in the case of give-ups)
- iv)** same account code
- v)** security ID (asset)
- vi)** position

1.2. The calculations of day trade and non-day trade volume for each asset comprises the theoretical portfolio of the Small Cap Index or the ETFs that track the Small Cap Index are defined daily by:

$$\begin{aligned}\text{Day trade volume}_i &= 2 \times \text{Minimum}(V_C, V_V) \\ \text{Non-day trade volume}_i &= (V_C + V_V) - \text{Day trade volume}_i\end{aligned}$$

Where:

"i" = each asset in the theoretical portfolio of the Small Cap Index or the ETFs that track the Small Cap Index

V_C = buy volume of asset i

V_V = sell volume of asset i.

1.3. Daily consolidation of the volumes of the assets of the theoretical portfolio for the respective reference index of the ETF:

$$\begin{aligned}\text{Day trade volume}_{day} &= \sum_i \text{Day trade volume}_i \\ \text{Non-day trade volume}_{day} &= \sum_i \text{Non-day traded volume}_i \\ \text{Total volume}_{day} &= \text{Day trade volume}_{day} + \text{Non-day trade volume}_{day}\end{aligned}$$

Where "i" represents each asset in the theoretical portfolio of the Small Cap Index or the ETFs that track the Small Cap Index.

2. Segregation of the excess financial volume of the hedge between the excess day trade volume and excess non-day trade volume:

$$\begin{aligned}\text{Excess day trade volume}_{day} &= p_{day} \times \text{Excess volume}_{day} \\ \text{Excess non-day trade volume}_{day} \\ &= \text{Excess volume}_{day} - \text{Excess day trade volume}_{day}\end{aligned}$$

Where p_{day} is a proportion of the excess day trade volume over the total volume per day, calculated as:

$$p_{day} = \frac{\text{Excess volume}_{day}}{\text{Total volume}_{day}}$$

Where:

Excess volume_{day} = defined in accordance with the rules of item 3 Annex II hereto

Total volume_{day} = defined in item 1.3 of Annex II hereto

p_{day} = the proportion rounded up to two decimal places.

2.1 Application of the trading and settlement fees to the excess volumes of the programs of this Circular Letter.

Trading and settlement fees foreseen for the cash market are applied to the excess day trade and non-day trade volumes.

The charging of exchange fees and other fees on excess is accumulated and executed on the month following that of trading.

3. General provisions

The entire volume (whether exempted or charged a fee as excess) of the asset in the account rstered in the program is **not** considered in the composition of ADTV, which daily defines the trading and settlement fees for the day trade volumes in the accounts not registered in the program.

Fee benefits of other B3 programs do **not** apply to the excess volumes in the accounts registered in this program.