

**ASSET SELECTION AND ALLOCATION POLICY**  
**OF**  
**MIRADOURO ASSET MANAGEMENT LTDA.**

Version 2024.01 – October 1, 2024

In compliance with current regulations and in line with ANBIMA's self-regulatory framework, MIRADOURO ASSET MANAGEMENT LTDA. ("Miradouro") maintains this Asset Selection and Allocation Policy ("Policy"), aiming to implement the internal rules and controls necessary for the acquisition and monitoring of assets ("Assets") that are to form part of the portfolios under its management.

Other defined terms mentioned herein may be found in the Code of Ethics.

**1. Responsibility for Credit Analysis and Management**

Responsibility for the analysis and management of Assets acquired by the portfolios managed by Miradouro shall rest with the managing partner responsible for management, who shall supervise all Asset acquisition operations and monitor them in accordance with this Policy.

**2. Procedures for Asset Acquisition**

For the acquisition of Assets, Miradouro shall, at a minimum, take the following steps:

- (i) verify, prior to acquisition, the compatibility of the Asset to be acquired with the investment policy of the respective managed portfolio (whether a managed portfolio or an investment fund portfolio) and with current regulations;
  - (ii) assess the payment capacity of the debtor and/or its subsidiaries, as well as the quality of any guarantees involved, obtaining the relevant documentation necessary for such assessment. Such assessment shall be based on consistent, verifiable criteria supported by internal and external information;
  - (iii) observe the investment limits for Assets, for portfolios under Miradouro's management, where applicable, and for issuers or counterparties with similar characteristics;
  - (iv) consider, on a case-by-case basis, the importance of combining quantitative and qualitative analyses and, in certain situations, use metrics based on the debtor's financial ratios, accompanied by duly documented analysis;
  - (v) invest in Assets only if it has had access to the information necessary for proper credit risk analysis for the purchase and monitoring of the asset;
  - (vi) in transactions involving companies of Miradouro's conglomerate or economic group in relation to the managed portfolios, apply the same criteria used in transactions with third parties, maintaining documentation to demonstrate that transactions were carried out on an equitable basis and free from conflicts of interest;
- and

(vii) preferably, invest in Assets from corporate issuers whose financial statements are audited annually by an independent auditor authorized by the Brazilian Securities and Exchange Commission (CVM) and/or the Central Bank of Brazil.

Notwithstanding the provisions of item (vii) above, Miradouro may invest in Assets of companies that do not have their financial statements audited only where permitted under applicable legislation and regulations.

The rating and summary of the asset or issuer provided by a credit rating agency, where available, shall be used as additional information to the credit risk assessment and other risks to be carried out, and not as a sufficient condition for their acquisition and monitoring.

Miradouro may also establish an internal rating for the credit risk classification of acquired Assets.

Miradouro will maintain a register and record of the different Assets acquired by the portfolios under its management, so as to enable the compilation of the characteristics of these assets in terms of:

- (i) Credit instrument;
- (ii) Instalment dates and amounts;
- (iii) Contracting and maturity dates;
- (iv) Interest rates;
- (v) Guarantees;
- (vi) Date and acquisition value by the managed portfolio; and
- (vii) Information on the asset's rating, where applicable.

Credit analyses of transactions shall be based on consistent, verifiable criteria supported by internal and external information.

### **3. Procedures for Asset Monitoring**

For the monitoring of Assets forming part of the portfolios under its management, Miradouro shall, at a minimum, take the following steps:

- (i) Miradouro will carry out weekly monitoring of the exposure limits set out in the regulations of the managed portfolios, in managed portfolio contracts and in current regulations, so as to avoid non-compliance;
- (ii) Miradouro will periodically monitor the credit quality of Asset issuers by verifying their default history, as well as through published or disclosed information involving the financial capacity of the respective issuer and/or by requesting information from the issuer when this is not publicly available; and
- (iii) Miradouro will analyse the rating reports of the Asset and its issuer, noting that such analysis will be considered merely as additional information and cannot be considered sufficient for monitoring purposes.

Periodic verification of the credit quality of the main issuers/debtors of Assets forming part of the managed portfolios will be carried out in proportion to credit quality, i.e., the worse the

quality, the shorter the interval between reassessments.

Reassessments, as well as assessments at the time of acquisition, shall be formalised in writing and shall remain archived physically and electronically at Miradouro's headquarters for the periods required under the ANBIMA Code and current regulations.

#### **4. Governance in Non-Compliance Situations**

In the event of any non-compliance situation with the existing limits in relation to the portfolios under Miradouro's management:

- (i) the managing partner responsible for management shall immediately notify the Risk and Compliance Department, in order to report the occurrence and plan the measures to be taken to remedy the situation;
- (ii) the Risk and Compliance Department will meet with members of the management area to investigate the potential non-compliance, analyse the causes of its occurrence and establish corrective measures; and
- (iii) after defining the necessary measures, the management area will take the steps necessary to restore the established exposure limits.

Finally, the Risk and Compliance Department will carry out an assessment of the preventive measures to be taken in order to avoid new occurrences of the same nature.

#### **5. Documentation**

Asset assessments and reassessments shall be formalised and made available to ANBIMA, whenever requested, for the periods set out in the ANBIMA Code and current regulations.

#### **6. Periodic Review of this Policy**

This Policy will be reviewed and assessed annually by the Risk and Compliance Department together with the other employees designated for risk management at Miradouro, and adherence tests are also carried out at such intervals to test its effective applicability. Furthermore, this Policy may be reviewed at shorter intervals in the event of situations that reveal inconsistencies in its content.

\* \* \*