

# POLICY ON OPERATIONS, APPORTIONMENT AND ORDERS ALLOCATION

KIRON CAPITAL GESTÃO DE RECURSOS LTDA

Version 2.3  
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# OPERATION, APPORTIONMENT AND ORDERS ALLOCATION

## 1 INTRODUCTION

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KIRON seeks to defend the best interests of its Investment Vehicles by (i) making adequate investment decisions in light of the Investment Vehicle's objectives, needs and investment circumstances; and (ii) conduct operations in a manner consistent with Applicable Laws.

All apportionment and order allocations will be carried out with the aim of providing all investors, regardless of the vehicle in which they are allocated, with equal opportunities. In order to do so, order executions will be divided proportionally, always with the same average share price and in compliance with the peculiarities of each investment mandate.

KIRON must, through adequate internal control mechanisms, ensure ongoing compliance with the current rules and regulations referring to the various alternatives and modalities of investment, the activity of resource management per se, and standards of ethical and professional conduct.

Before the allocation is made, the following criteria will be observed for each portfolio: (i) legal and regulatory restrictions; (ii) the investment restrictions of each investment fund; and (iii) fractional lots or transaction costs that are excessive in relation to the size of the client's participation in the apportionment of the opportunity.

## 2 BEST EXECUTION

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KIRON's policy with respect to transaction costs, whether related to shares, fixed income, derivatives or currency transactions, and whether in the form of a commission, spread or other compensation, is that such costs are borne by the Investment Vehicles and therefore should be closely monitored for Best Execution. Correspondingly, when selecting a broker for each specific transaction of an Investment Vehicle, KIRON will use its best judgment to choose the most capable broker to provide the Best Execution.

An investment manager has the duty to obtain the Best Execution for the transactions of his/her Investment Vehicles when he/she is in a position to direct the orders to the brokerage firms. The Best Execution is determined in the context of a specific transaction or in relation to the general obligations of execution of the investment manager regarding the assets of the portfolio. The elements that define Best Execution include: best price (the best price is considered as the highest price that a portfolio can sell a security and the lowest price a portfolio can buy a security); timing of the execution; quality of the research provided; the broker's responsiveness to KIRON; and the broker's financial resources.

## 3 POLICY ON APPORTIONMENT AND ORDER ALLOCATION

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Investment managers have an affirmative duty to act in good faith for the benefit of their clients and, as a matter of fiduciary duty, investment managers must ensure that when allocating and aggregating securities transactions, clients are treated in an absolutely fair and equitable manner.

### 3.1 Allocation of orders

KIRON manages the Investment Vehicles *in pari passu*, allocating transactions in a pro-rated manner between the Investment Vehicles, automatically and without manual intervention – using its order generation system (OMS), which is parameterized to proceed with the allocation of transactions in this format (pro-rated), always based on the average price practiced on the day, and respecting the mandates of each of the Investment Vehicles under management to accommodate any restrictions of any portfolio.

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# OPERATION, APPORTIONMENT AND ORDERS ALLOCATION

## 3.1.1 Allocation policy

The Company's overall objective is to treat each Investment Vehicle in a fair and equitable manner, aligned with its fiduciary duty. In no case will the allocation of orders be based on any fees, performance or considerations other than the interests of the Company's Investment Vehicles.

## 4 LAUNCH OF OPERATION ORDERS

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It is Company policy that transactions are conducted in the most efficient and consistent manner with the guidelines of the Investment Vehicle and Applicable Laws. The Company retains certain records related to the placement and execution of transactions for the Investment Vehicles through the Inoa Alphatools system, which are available full time for consultation and audit.

### 4.1 Operation Order Requirements

Each operation order shall provide the following information:

- The date of operation;
- The broker / counterparty used;
- Whether it is a buy or sale;
- The name of each account intended to be included in the order;
- The name/symbol of the security to be bought or sold;
- The amount or number of shares, percentage weighting or amount of money to be purchased or sold to the Investment Vehicle included in the order;
- Any markup, markdown, transaction fees and/or brokerage fees incurred; and
- The terms or special instructions of the order (e.g. price limit, designated broker, valid until cancellation), if any.