



**ORDERS PRORATION AND  
DIVISION POLICY**

**DUNAMIS TRADING GESTÃO DE  
RECURSOS LTDA.**

**June 2024**



## **1. Introduction**

**DUNAMIS TRADING GESTÃO DE RECURSOS LTDA.** ("Manager") intends to manage third party resources through program-based computer systems with automated algorithms and systems for financial market trading.

Thus, the securities funds' portfolios orders managed by the Manager will be directed by specific fund, with the final principal's specification, with no need, at first, of proration.

Nevertheless, in any need for orders proration and division for lot-traded transactions distribution, this Orders Proration and Division Policy between Securities Portfolios ("Orders Proration Policy") will be used, the risk and compliance areas being held liable to update the necessary information for pre-established criteria controls maintenance, for admission of the securities portfolios acquired assets trading orders grouping and proration under the Manager's management, as determined by CVM Instruction No. 558 of March 26, 2015, as amended.

The Manager shall prepare and maintain updated versions of this Orders Proration and Division Policy on its website, along with the following documents: (i) Reference Form, the contents of which shall reflect Appendix 15-II of CVM Instruction 558/15; (ii) Ethics Code; (iii) Compliance Policy; (iv) Employees Securities Purchase and Sale Policy (Personal Investment Policy); and (v) Risk Management Policy.

## **2. Order Proration Method**

This Order Proration Policy aims to control a fair allocation of orders between portfolios managed by the same manager, seeking to ensure that the purchase and sale orders of financial assets issued on behalf of such portfolios are recorded and allocated fairly between them, through orders grouping, providing equitable and equal treatment between portfolios and, ultimately, among investors with resources managed by the same manager.

The Manager, in this sense, may request a broker or securities dealer to trade or register a certain assets purchase or sale operation for one or more portfolios under management, under the conditions that may be specified by the Manager.



Thus, the assets selection for portfolios under the Manager's management cannot oppose the fiduciary duty to obtain greater profitability for clients to any advantages that may be offered to the manager. At the time of assets proration between the assorted portfolios, such division should occur equitably and without benefiting some clients to the detriment of others.

The orders always will be transmitted verbally, by phone, or transmitted in writing, by electronic means (email, *Skype*, *Telegram*, *Whatsapp*, *Bloomberg*, *Messengers*, etc.), being that, regardless of the transmission form, all orders must be confirmed by email (call-back) and will be recorded and filed by the Manager.

In case that some purchase or sale order transmitted by the Manager, referring to an only asset, comes to relate to more than one wallet under management, the Manager shall, after the transmitted orders execution, to carry out a proportional proration of the involved transactions costs and assets (in amount and value) in relation to each one of respective securities portfolios, in a way to not allow the assessment of any advantage for one or more wallets in detriment of others.

Using a proprietary system for order calculation and mirror portfolio balancing, each new operation is already defined in relation to the proportion to be assigned to each fund. A single order is then transmitted and carried out, ensuring that at the time of proration the nearest average price is respected for all portfolios involved in the operation, even if the execution was partial.