



Subject **Business Continuity Policy**

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to Administrators, managers, employees, and other collaborators of Southtree Capital

The purpose of this document is to define the procedures that should be followed regarding contingency to prevent the company from facing operational discontinuity risks in situations where access to the headquarters office is unavailable.

This document is divided into the following sections:

1 . Steps and Procedures for the Contingency Policy

- 1.1 – Operational Structure
- 1.2 – Backup policy and procedures
- 1.3 – Operational sensitivity
- 1.4 – Effective contingency
- 1.5 – Support structure
- 1.6 – Testing
- 1.7 – Documentation

Stages

1.1 Operational Structure

Southtree Capital ("Southtree") is a company whose main objective is to manage investment vehicles.

To support its operational structure, the company relies on a skilled workforce, technological infrastructure, and respective support areas.

1.2 Policy and Procedures for Backup

Every day, all files located on Southtree's file network are automatically copied to an electronic tape. Emails are hosted by Microsoft and are backed up daily, with the ability to recover deleted emails within a period of 5 years.

There are 2 tapes in use, with the first one remaining in the company for daily backups, while the second one, for security reasons, is kept by the Director of

Operations off-site. In addition, there is a third tape, also kept by the Director of Operations off-site, containing the files from the last business day of the past 5 years.

The above-described operational procedure will be tested at a maximum semi-annual frequency. The testing includes the recovery of files from the current year and previous years. The responsibility for the evaluation procedure lies with Southtree's Operations Directorate.

This procedure encompasses all files and emails archived on Southtree network. It is worth noting that files located on the hard drives of devices used by employees, staff, or partners are not covered by this procedure.

1.2 *Operational Sensitivity*

Southtree manages financial investment vehicles that may involve daily applications, redemptions, and/or transactions that cannot wait for the restoration of its activities for more than one business day.

The fact that the administrator of the investment vehicles is an external institution to Southtree, and also, the fact that communication between the manager and administrator occurs electronically, implies that the contingency site must have internet access, as well as tools that allow access to order transmission and confirmation systems.

1.4 *Operational Sensitivity*

In accordance with the characteristics mentioned in the previous items, Southtree has an external contingency site. At this location, there is a laptop suitable for operation, according to the operational sensitivity described in the previous item.

1.5 *Support Structure*

In case there is a real need to use the contingency structure, the individuals responsible for the following roles should be directed to the contingency site:

- Operator responsible for order placement;;
- Back office operator (responsible for communication with the administrator);
- and
- Director of Operations

1.6 *Testing*

Annually, effective tests of the contingency site usage are conducted, and the respective analytical reports are archived.

1.7 *Documentation*

A list containing the information of all Southtree members, brokerage firms conducting business with them, clients, and contracted service providers must be maintained at the contingency site.