

Title

Segregation of Activities

Number	Version	Publication Date	Type
05.1229	6	16/08/2024	Standard

Coverage

Bradesco Asset Management

Short Description

Rules and procedures adopted regarding the Segregation of Activities of Bradesco Asset Management.[Latest Changes](#)[1 Objective](#)[2 Segregation of Activities Management](#)[2.1 Physical segregation](#)[2.2 Logical Segregation](#)[2.3 Segregation of Duties](#)**Latest Changes**

Revision of the Standard with changes in rules and procedures. We recommend reading it in full.

1 Objective

The Segregation of Activities Standard aims to demonstrate the rules adopted to ensure physical, logical, functional, and informational segregation between the areas belonging to Bradesco Asset Management ("Bradesco Asset"), as well as between Bradesco Asset and the other Branches of the Bradesco Organization, under the terms of the applicable regulations.

2 Segregation of Activities Management

Bradesco Asset establishes the following points necessary for the effectiveness of this process:

- a) Maintain the segregation of third-party resource management activities from any and all other activities carried out by Banco Bradesco S.A., including, but not limited to, the management of own resources and fiduciary administration;

- b) Maintain the segregation of activities between the Asset Management areas and the Investment Solutions area (Funds of Funds Management), in order to prevent information related to Funds managed by third parties from being accessed by the other Management areas of Bradesco Asset;
- c) Preserve information considered confidential;
- d) Restrict and control access to files containing sensitive business information;
- e) Implement and maintain awareness actions for people who have access to confidential information and/or participate in the investment decision process;
- f) Maintain the independence of the Risk Management area, which must report directly to the Director of Bradesco Asset and to the Director of Internal Controls of Banco Bradesco S.A.;
- g) Preserve the segregation of the Trading area from the other Resource Management areas, in order to ensure independence between the areas;
- h) Ensure the reporting of the activities of the Trading area directly to the Director of Bradesco Asset;
- i) Maintain the Investment Solution area (Funds of Funds Management) segregated from the other Asset Management areas, reporting directly to the Director of Bradesco Asset, in order to eliminate potential conflicts of interest;
- j) Implement and maintain a training program for managers, employees and collaborators who have access to confidential information, participate in the investment decision process or participate in the process of distribution of investment fund quotas.

2.1 Physical segregation

Bradesco Asset must remain physically segregated from the other Premises of Banco Bradesco S.A., in order to establish effective control of employee access to its facilities.

Internally, Bradesco Asset's Investment Solutions area (Fund of Funds Management) has to remain physically segregated from the other areas. Access control of the area must occur through functional identification.

In addition, the Distribution area must be kept physically distant from the Management areas, in order to preserve sensitive information related to allocation strategies.

2.2 Logical segregation

Logical controls are those established over electronic and communication systems, aimed at limiting and/or monitoring access to information to preserve those considered confidential and allow the identification of employees who access them. Logical controls over electronic systems help segregate duties by restricting access to certain transactions.

In this sense, access must be granted through function profiles previously established in segregation of duties matrices and their effectiveness must be measured through tests carried out by the Internal Controls area.

2.3 Segregation of Duties

Information segregation aims to restrict access to management information considered sensitive, such as investment strategies and decisions.

To this end, in addition to the logical access controls mentioned in item 2.2, controls must be established to maintain the integrity and restriction of information, following the governance established in Bradesco Asset's forums.

Department

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We declare this is a free English translation of the Bradesco Asset's Segregation of Duties Policy, classified as a public document by the Bradesco Organization.