## **Item 2: Material Changes**

The following are the material changes for our Brochure since the firm's last annual update on March 30, 2023:

#### Item 4

- In the section "Our Firm," we updated the ownership interest in our General Partner and updated our assets under management/assets under advisement as of December 31, 2023.
- We added Exchange-Traded Funds (ETFs) to the section "Institutional And Private Client Separate Accounts."

#### Item 7

In the "Types Of Clients" section, we added ETFs.

#### Item 8

In the "Brandes Offers The Following Equity Strategies" section, we have changed the benchmark for our Global and International Small Cap and SMID Cap equity strategies.

#### Item 10

- We added the 2023 ETF Series Trust to the section "Other Financial Industry Activities And Affiliations."

#### Item 11

- We added the 2023 ETF Series Trust to the section "Participation Or Interest In Client Transactions."

### Item 12

- We added a new section, "Equity Strategies Exchange-Traded Funds (ETFs)," to this item.
- We updated the "Best Execution And Broker Selection" and "Aggregation, Rotation And Allocation" sections for clarity and to reflect our current practices.
- In the "Research And Soft Dollar Benefits" section, we updated the list of broker-dealers who provided the firm with research as a result of trade execution services during 2023.

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