

Banco Finantia Group Code of Conduct

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Chapter I

Scope and Objectives

Article 1 - Scope of Application

This Code of Conduct (hereinafter referred to as the "**Code**") is applicable to the members of the governing bodies, managers and other employees of Banco Finantia, S.A., including its branch (hereinafter referred to as the "**Bank**") and the companies that are, directly or indirectly, controlled by it (together, hereinafter referred to as the "**Group**" or "**Banco Finantia Group**"), as well as the service providers of any of these companies, when the nature of their duties so justifies (hereinafter jointly and generically referred to as "**Employees**").

Article 2 - Objectives

This Code aims to:

- a** Establish the set of principles, values and rules of action for all Banco Finantia Group employees in matters of professional conduct, promoting the adoption of ethical conduct in line with the Group's values;
- b** Establish the guiding principles and internal rules that Banco Finantia Group employees must comply with in their relationship with costumers;
- c** Promote respect for and compliance with applicable legislation, regulations and guidelines, in particular the criminal rules on corruption and related offenses, as well as the internal rules in force within the Banco Finantia Group;
- d** Defining acceptable and unacceptable behavior and the respective prevention, control and communication measures and procedures, as well as the disciplinary or other sanctions that, under the terms of the law, may be applied in the event of non-compliance with the rules contained therein;
- e** Contribute to the promotion of an organizational conduct and culture of legal compliance and conformity with the adopted values and principles, as well as to the development of best practices of corporate governance and ethical conduct.

Chapter II

Professional Conduct

Article 3 - General Principles

- 1 Banco Finantia Group's Employees must act in accordance with strict standards of integrity, honesty, competence and professional ethics, both internally and with customers or any other person or entity with which they have a relationship.
- 2 The provisions of the previous paragraph apply in particular to Employees who deal directly with markets, sensitive information, data management, suppliers and direct customer service.
- 3 The Banco Finantia Group's ethics are reflected in compliance with the current legislation and regulations, in the adoption of the corporate principles and values established internally,

namely respect for confidentiality and neutrality in relations with customers and loyal cooperation with the judicial, tax and administrative authorities.

- 4 The Banco Finantia Group promotes a policy of health and safety at work and adopts the preventive measures provided for in the legislation in force.

Article 4 - Non-Discrimination and Equal Treatment

- 1 The Banco Finantia Group guarantees its employees a professional environment that promotes diversity, equal treatment and opportunities, and is guided by mutual respect and non-discrimination.
- 2 Employees must respect ideological, political, religious, sexual and other orientations that pertain to the private sphere of each individual, abstaining from any discriminatory practice based on any of these circumstances and ensuring that these do not interfere with the exercise of their professional activity.
- 3 No Employee shall be favored, privileged, prejudiced or deprived of any right or exempted from any duty on the grounds of ancestry, gender, race, language, territory of origin or on the grounds of the circumstances referred to in the preceding paragraph.

Article 5 - Harassment at work

- 1 Harassment of any kind and, in general, any practice that may reveal abuse of authority or violence at work towards Banco Finantia Group Employees and by them towards colleagues, customers, partners or any persons with whom they interact is prohibited.
- 2 Employees shall conduct themselves in such a way as to refrain from any acts that could be construed as harassment, as provided for in paragraph 3 of this article and in paragraphs 2 and 3 of article 29 of the Labor Code.
- 3 Harassment means unwanted behavior, particularly on grounds of discrimination, occurring when accessing employment or during employment, occupation or training, with the purpose or effect of disturbing or embarrassing a person, affecting their dignity, or creating an intimidating, hostile, degrading, humiliating or offensive environment.
- 4 In this regard, the Group's employees must:
 - a Refrain from practicing or adopting any behavior that constituting harassment;
 - b Adopt exemplary behavior and good conduct in order to avoid, prevent and combat harassment at work;
 - c Immediately communicate, in a detailed and reasoned manner, to the *Compliance* Department or, if the situation of harassment arising from this department, to the Human Resources Department, any behavior or situation that they detect or become aware of, that constitutes harassment in any of its forms.
- 5 The Banco Finantia Group will initiate the appropriate disciplinary procedures whenever it becomes aware of alleged situations of harassment at work, and will not impose disciplinary sanctions on whistleblowers and witnesses indicated by them, unless they act maliciously or on the basis of false statements.

- 6 All Employees involved in internal procedures relating to harassment at work must act in accordance with the duties of good faith, confidentiality, discretion, secrecy, impartiality and non-retaliation, and shall not divulge any information accessed or which comes to their knowledge in the course of such procedures.

Article 6 - Image and Reputation

- 1 In their professional performance, Employees must pursue the interests of the Banco Finantia Group, preserving its good name and reputation, both internally and in relations with customers, investors, supervisory authorities and other third parties.
- 2 The granting of economic or social advantages to parties or entities of a political nature in the name of the Banco Finantia Group by any of its Employees is not permitted.

Article 7 - Regulatory Compliance and Risk Tolerance

Employees must use their technical and professional skills with prudence and care appropriate to the performance of their activity and, to that extent, they shall:

- i Respect full and strict compliance with applicable legislation, regulations and guidelines, as well as the internal rules in force within the Banco Finantia Group, refraining from practicing or suggesting to customers or third parties the adoption of any conduct, operation or business that violates or may violate the provisions of the rules and other legal provisions that govern their activities;
- ii Adopt behavior in line with the risk tolerance levels defined by the Banco Finantia Group.

Article 8 - Free Competition

It is forbidden to engage in any practices that infringe competition law, so Employees may not pursue or engage in activities that are dishonest, unfair or contrary to fair and free competition, such as agreements or concerted practices (including exchanges of sensitive commercial information on prices charged, business volumes or market shares, or sensitive strategic information).

Article 9 - Professional Conduct

In the exercise of their functions, Employees must conduct themselves in accordance to the highest possible standards of competence, diligence and efficiency and, to this end, must:

- i Refrain from using the image, name or brand of the Banco Finantia Group;
- ii Refrain from invoking their status as an Employee if not for the proper development of their activity;
- iii Limit themselves to perform the functions and activities for which they are specifically authorized and certified;

- iv Refrain from making any judgments or considerations on matters of a legal, fiscal or financial nature that go beyond the information they are required to provide to customers in the marketing of financial products;
- v Refrain from using their position in the Banco Finantia Group hierarchy or structure to obtain any advantage for themselves or third parties;
- vi Refrain from their own benefit from carrying out business opportunities presented to them by third parties;
- vii Protecting the assets of the Banco Finantia Group to which they have access, avoiding use beyond what is necessary for the performance of their duties, acting to minimize the risks of the activity;
- viii Keep and maintain in perfect order and archive all the elements and documents related to their professional activity;
- ix Constantly seek to improve and update their knowledge, skills and qualifications, in particular by taking part in the training courses provided by the Bank Finantia and by following the informative circulars made available internally.

Article 10 - Duty of Confidentiality

- 1 Employees are bound by the duty of confidentiality, and may not, in any way, disclose, transmit or use information concerning the life of the Banco Finantia Group or its relations with its customers, unless within the normal scope of their duties and/or in compliance with the law or a final court decision.
- 2 The duty of confidentiality covers the disclosure of information to other Bank Employees who do not need or should not have access to that information for the performance of their duties.
- 3 All information or knowledge to which Employees have access in the course of their professional activity, which is considered confidential, must not be used for their own benefit or for the benefit of third parties. Confidential information includes, by way of example, reports, accounts, balance sheets, objectives, employees' private data and/or customers' transactions and positions.
- 4 The duty of confidentiality does not cease with the end of the performance of the respective functions or the provision of services, in which case Employees must return all confidential information in their possession, as well as the devices on which it is stored.

Article 11 - Conflicts of Interest

- 1 Employees must avoid any situation or activity in which their interests may interfere in any way with the interests of the Banco Finantia Group or its customers.
- 2 Employees must promptly inform the *Compliance* Department whenever they identify a potential or actual conflict of interest. This communication aims to ensure that appropriate measures are implemented to solve the situation effectively.
- 3 Employees must ensure that transactions in which the Banco Finantia Group entities participate and which involve related parties are carried out under normal market conditions.
- 4 The procedures described in this article shall apply, *mutatis mutandis*, to transactions with related parties.

- 5 Employees must comply with the internal rules in force on conflicts of interest, namely the provisions of "Conflicts of Interest Policy of the Banco Finantia Group" and the "Policy on the Prevention, reporting and resolution of Conflicts of Interest involving Related Parties" and comply with the applicable legal, regulatory and contractual provisions.

Article 12 – Gifts and Benefits

- 1 As detailed in the "Conflicts of Interest Policy of the Banco Finantia Group" and the "Banco Finantia Group Anti-Corruption Policy", Employees must not request, receive or accept, for their own benefit or for the benefit of third parties, any benefits, rewards, remuneration or gifts that exceed the merely symbolic value, in accordance with social usage/custom and defined in the terms of the said Policies, and that may in any way be related to the activity and functions that Employees perform in the Banco Finantia Group.
- 2 Whenever these exceeds a merely symbolic value, Employees must follow the procedure described in these Policies and declare the offers or rewards received in writing to the *Compliance* Department.
- 3 The Banco Finantia Group Employees may not offer any gifts, benefits, rewards or any other type of invitation or favor to third parties with whom they relate in the course of their activity, which exceed the merely symbolic value in accordance with the social usages/customs defined in the "Conflicts of Interest Policy of the Banco Finantia Group" and in the " of "Banco Finantia Group Anti-Corruption Policy".

Article 13 - Intellectual and Industrial Property

- 1 Employees must respect the intellectual and industrial property rights of the Banco Finantia Group, as well as those of third parties, and are not reproduce, copy, distribute, modify, transfer or disclose documents, studies, projects, databases or other content protected by such rights.
- 2 Employees are responsible for preserving equipment and other resources made available for the performance of their activities, avoiding their inappropriate use. They must contribute to the efficient and sustainable management of these resources.
- 3 It is also forbidden to use the Group's databases, such as those of customers, partners or suppliers, for purposes other than those defined when they were created.

Article 14 - Sustainable Development and Environmental Responsibility

- 1 The Banco Finantia Group is committed to contributing to sustainable development by proactively managing the environmental, social and economic impacts of its activities.
- 2 Employees shall care for the conservation, maintenance and efficient use of the resources made available to them, observing the legal rules, procedures and internal recommendations on sustainability and responsible resource management, with the aim of reducing the environmental impact of the Group's activities.

Chapter III Digital Conduct

Article 15 - Organization and Information Security

- 1 The Banco Finantia Group defines internally the rules that Employees must comply with in the use of computer and technological resources – in particular e-mail, mobile phones and laptops - that are made available to them for the performance of their professional activity, as well as the rules to be complied with in the preservation and organization of information, in order to ensure strict compliance with their duty of confidentiality and the security of information.
- 2 Employees undertake to take full and effective cognizance of these internal provisions, which include the "Mobile Equipment Use and Remote Access Policy", the "Information Systems Policy" and the "Employee Handbook", and commit to strict compliance with them.

Article 16 - Use of Social Networks

- 1 The Banco Finantia Group respects the freedom of expression and other rights of each of its Employees but recommends that they use social networks exclusively on a personal basis.
- 2 If Banco Finantia Group's Employees identify themselves as such on social networks, they must adopt a neutral stance consistent with their position and responsibilities, refraining from adopting behaviors that are contrary to the principles and values of the Group, or that may jeopardize its image and/or reputation.

Article 17 - Use of Artificial Intelligence Systems

- 1 Employees must know, promote and comply with the applicable legal, regulatory and internal rules, as well as use Artificial Intelligence Systems responsibly and ethically, ensuring that information generated by these systems is used appropriately and without violating the protection of personal or confidential data.
- 2 Employees must report any incidents or non-compliance related to the use of Artificial Intelligence to the Systems & Telecommunications Department. In addition, Employees must collaborate in audits and impact assessments and participate in training activities promoted by the Banco Finantia Group.
- 3 Employees undertake full and effective cognizance of the internal provisions on Artificial Intelligence, in particular those contained in the "Policy for the Responsible Use of Artificial Intelligence (AI) Systems in the Banco Finantia Group" and must report any non-compliance with this Policy to the *Compliance* Department.

Chapter III

Customer relations

Article 18 - Duty of Loyalty and Impartiality

- 1 Group's employees shall treat fair treatment all their customers or third parties with whom they relate in the course of their professional activity, in accordance with the best market practices, guiding their relationship by the values of loyalty, trust and respect.
- 2 Any kind of interference or influence from customers, suppliers or third parties which may could alter the impartiality and professional objectivity of Employees must be avoided. This applies in particular to Employees who have to make decisions on the purchase of supplies and services and those who decide on the economic conditions of transactions with customers.

Article 19 - Protection of Customers

- 1 Employees must give priority to the legitimate interests of customers, both in relation to the interests of the Banco Finantia Group and in relation to their own interests.
- 2 Employees must provide customers with all the information for them to make informed and well-founded decisions regarding the products and services offered that are requested from them or that they effectively provide.
- 3 Customers will be informed clearly and precisely, on request, of the details of the transactions they enter into.

Article 20 - Customer Complaints

- 1 The Banco Finantia Group shall ensure that all customers have the right to submit complaints undertaking that these will be subject to diligent, impartial and fair analysis and treatment, in accordance with the provisions of the legislation in force and the applicable internal rules adopted by the Group.
- 2 Employees must act rigorously and diligently to comply with the deadlines defined for handling complaints and abstain from taking any attitude that discourages customers from presenting them.
- 3 The *Compliance* Department's is responsible for ensuring that the handling of complaints submitted by Customers is duly carried out by the respective manager (in the Branch, the handling of complaints is the responsibility of the *Customer Services*).

Chapter IV Special Duties

Article 21 - Prevention of Money Laundering

- 1 For the purposes of preventing transactions related to money laundering and financing terrorist, the Banco Finantia Group has internal regulations and procedures, namely the "Policy" and the "Manual on Prevention of Money Laundering and Financing of Terrorism and Compliance with Restrictive Measures", which sets out the duties laid down in current legal system, as well as internal measures and procedures aimed at compliance with the aforementioned duties.
- 2 Employees are bound to comply with these duties, namely the duty of diligence with regarding to the knowledge they should have of the client and third parties with whom they have a relationship, the duty to keep documents and the duty to report, in a timely manner, any transactions suspected of money laundering or terrorist financing.

Article 22 - Whistleblowing Channel

- 1 In order to ensure the effective application of the provisions of this Code, the Banco Finantia Group has a Whistleblowing Channel, which allows all Employees to report well-founded suspicions of any irregular or illegal practices that indicate a breach of this Code of Conduct or of any legal or internal rule in force, as well as the practice of an illegal activity, in order to prevent or stop such practices from causing financial or reputational damage to the Banco Finantia Group
- 2 The communications referred to in the previous paragraph must be made and will be processed under the terms of the " Reporting of Irregularities Policy".
- 3 In any case, confidentiality will always be guaranteed in the handling of the report and it will be ensure that the employee making the report, and the witnesses indicated by them, cannot be disciplined or suffer any kind of disadvantage or reprisal as a result of such a report, unless they act with intent or on the basis of false statements.

Article 23 - Prevention of Corruption and Related Infringements

- 1 Employees must abstain from engaging in any conduct that involves a violation of any legal provision established in the different jurisdictions of the countries in which the Group operates, in particular corrupt practices, receiving or offering, for themselves or for a third party, undue payments, advantages or commissions, regardless of the circumstances.
- 2 These practices are absolutely forbidden and must be reported immediately through the Group's Whistleblowing Channel.
- 3 As part of its commitment to preventing corruption, the Group has adopted a "Anti-Corruption Policy", which sets out and develops the provisions contained in this Code regarding the prevention, detection and punishment of corruption in any of its forms.

Article 24 - Relations with Public Authorities

- 1 The Banco Finantia Group and its Employees diligently provide the Public Authorities and to the supervision and inspection entities all the cooperation that, under the terms of the law, is requested and required of them.
- 2 Requests for information and seizure in relation to Banco Finantia Group customers received from judicial bodies, the public administration or any other public body must always be supervised, prior to a response, by the Legal Department and the *Compliance* Department.
- 3 In all relations with third parties, but particularly in relations with Public Authorities, all Group Employees must observe and comply with the provisions of Articles 12 and 23 of this Code of Conduct.

Article 25 - Relations with the Media and External Bodies

- 1 Employees must refrain from transmitting to the media and other external entities, on their own initiative or at the request of third parties, any news or information about Banco Finantia or any entity comprising the Banco Finantia Group.
- 2 Any communication must be informed in advance and authorized by the person who is competent to do so, under the terms of the internal regulations.
- 3 The provisions of the preceding paragraph shall not apply in situations where, cumulatively, it is not possible to obtain prior authorization in due time, and the contact is made in the scope of the performance of functions on behalf of the Bank.

Article 26 - Personal Transactions by Employees

- 1 Employees involved in activities likely to give rise to a conflict of interest or who have access to privileged or other confidential information are prohibited from carrying out personal transactions or advising or soliciting others to carry out transactions in financial instruments, whenever this involves the unlawful use or improper disclosure of privileged or confidential information and/or harm to the interests of the Banco Finantia Group.
- 2 Without prejudice to the preceding paragraph, the procedures relating to personal transactions set out in the "Banco Finantia Group's Conflicts of Interest Policy", in force at any given time, must be observed.

Article 27 - Prohibition of Transactions Based on Inside Information

- 1 Employees who, as a result of their duties, become aware of information that has not yet been made public and which may influence prices on any market, must keep such information under strict confidentiality and abstain from trading in the financial instruments involved until that information is made public.
- 2 Employees involved in or responsible for the organization and structuring of special transactions may not trade in the securities of the companies involved in the transaction, from the beginning of such organization and structuring until the operation is publicly announced.

- 3 Employees involved in or responsible for the preparation of studies on companies or sectors must abstain from trading in the securities of the companies or sectors being studied, from the beginning of the study until the documents are disclosed.

Article 28 - Accumulation of Activities

- 1 Employees may not engage in any activity outside the Banco Finantia Group, whether remunerated or not, which is incompatible with their activity, in particular if:
 - i The functions are legally incompatible with those carried out in the Group;
 - ii These will be carried out in terms that impair compliance with the working hours established by the Group or any obligations arising from the employment contract;
 - iii These compromise the duty of impartiality and probity required for the performance of their activity within the Group.
- 2 Any exercise of functions or activities outside the Banco Finantia Group by Employees must be communicated in advance to the Human Resources Department and the *Compliance* Department, to record and determine the possible existence of incompatibilities or restrictions under the terms referred to in the previous paragraph.

Article 29 - Data Protection

- 1 The Banco Finantia Group carefully complies with the legal rules and guidelines of the competent supervisory authorities on the protection of natural persons with regard to the processing of their personal data, the free movement of such data, the principles and duties to be observed in their processing and the exercise, in this context, of the rights of data subjects.
- 2 Employees must comply with the applicable legal provisions on data protection and must refrain from using personal data for illegitimate purposes or communicating them to persons or entities not authorized to access or process them.
- 3 The processing, automated or otherwise, of customers' personal data must be carried out in a way as to ensures the customers' right to privacy and compliance with legislation on the protection of personal data.
- 1 The procedures established internally in terms of data protection are defined in the "Personal Data Protection Policy", compliance with which is mandatory for all Employees comply.

Chapter V

Compliance with the Code, Disciplinary Power and Criminal Liability

Article 30 - Compliance with the Code

- 1 It is the responsibility of the Head for the Compliance Function, appointed by the Board of Directors of Banco Finantia, to promote the dissemination of this Code of Conduct, monitor its application and observance and ensure that it is updated.

- 2 This Code of Conduct is an integral part of a set of internal rules of the Banco Finantia Group that Employees must be aware of and failure to comply with them is punishable.
- 3 Compliance with the rules set out in this Code does not replace or prejudice the obligation of Employees to comply with the duties and obligations arising from the law, regulations or other applicable internal rules in relation to the matters set out in this Code.
- 4 Employees must inform the Head of Compliance whenever they become aware of or have reasonable suspicions of violations of this Code of Conduct, or of any behavior which may indicate that it is not being complied with, and must act in accordance with criteria of reasonableness and prudence, not being prejudiced in any way by this fact.
- 5 The Head of Compliance is responsible for providing the management and supervisory bodies of each of the companies in the Group with information on possible breaches of the rules of conduct envisaged in this Code of which it becomes aware by Employees.
- 6 Requests for clarification on the interpretation or application of this Code of Conduct should be addressed to the Head of Compliance.

Article 31 - Disciplinary Power

- 1 Breach of the rules set out in this Code of Conduct by the Group's Employees constitutes an offence that may lead to the initiation of a disciplinary proceedings and shall be subject to the regime set out in this chapter, without prejudice to the application of the civil, criminal or administrative provisions which may be applicable.
- 2 Likewise, Employees of the Banco Finantia Group who fail to report infractions or who provide false or erroneous information regarding acts or omissions of which they are aware and which may expose the Group to acts of corruption and related breaches, are subject to the application of disciplinary sanctions as provided for in the Portuguese Labor Code or equivalent labor legislation applicable to the Group's different subsidiaries.
- 3 In exercising disciplinary powers, the Bank may apply the disciplinary sanctions which, without prejudice to the provisions applicable in jurisdictions other than Portugal where the Banco Finantia Group does or will do business, are as follows: warning, written warning, pecuniary sanction, loss of holiday days, suspension from work with loss of pay and seniority, and dismissal without compensation.

Article 32 - Criminal Liability

- 1 In the exercise of their functions, Banco Finantia Group Employees must abstain from any typical conduct that could constitute the commission of a crime.
- 2 Without prejudice to the application of the disciplinary sanctions mentioned in the previous article, and to the civil and/or administrative liability that may be applicable, in the event of non-compliance with the rules established in this Code of Conduct involving criminal liability, criminal sanctions may also be applied.
- 3 In this non-compliance with acts of corruption and related offences, this is understood to mean the crimes provided for in the applicable criminal legislation in each jurisdiction, which are punishable by a fine or imprisonment, without prejudice to the provisions applicable in jurisdictions other than Portugal where the Banco Finantia Group does or will do business.

Article 33 - Competence

- 1 In the event of non-compliance with the rules laid down in this Code, the Human Resources Department will be responsible for taking the necessary steps to initiate the appropriate disciplinary procedures.
- 2 In conflicts of interest matters, it is the *Compliance* Department's responsibility, under the terms of the "Banco Finantia Group Conflicts of Interest Policy" in force, to inform the Human Resources Department, so that it may initiate the necessary and appropriate steps in each specific case.
- 3 With regard to breaches that imply criminal liability for employees, namely those related to the practice of acts of corruption and related offenses, it is the responsibility of the Head of Compliance to take the necessary steps to investigate the situation in question and draw up a report identifying the rules violated, the sanction applied, and the measures adopted or to be adopted within the scope of the internal control system defined for this type of situation.

Chapter VI Final Provisions

Article 34 - Declaration of Awareness

- 1 The Human Resources Department shall request each employee to expressly acknowledge the Code of Conduct, as well as its revisions, by signing the declaration of awareness, under the terms set out in Appendix I, or by means of suitable electronic data transmission.
- 2 Declarations signed by Employees are stored in a folder specifically for this purpose and under the responsibility of the Human Resources Department.

Article 35 - Training

- 1 Employees must participate diligently and with commitment in the internal or external training courses that are offered to them, with a view to providing them with the technical skills and ethical and deontological knowledge necessary for the full performance their duties.
- 2 The Banco Finantia Group will provide training and awareness-raising activities for its Employees at the beginning of their functions and at least every two years - except in cases where, by determination of the Head of the Compliance due to material changes to the content of this Code, an awareness-raising session is required at shorter intervals – on the principles, values and rules of action that all Employees must adopt in terms of professional ethics, as well as the legal, disciplinary and criminal consequences that may result from non-compliance with these principles, which may be carried out in face-to-face and/or in an *e-learning* format.
- 3 The training courses referred to in the previous paragraph are compulsory, and it is the responsibility of the Human Resources Department to keep a record of Employee's attendance, to ensure compliance with the frequency of attendance, under the terms defined in the previous paragraph.

Article 36 - Approval, Revision and Publication

- 1 The Code of Conduct is approved by the Bank's Board of Directors, after prior consultation with the Audit Committee, on the proposal of the Head of the Compliance Function¹.
- 2 This Code shall be subject to periodic review, to be carried out at least every two years or whenever there are changes that justify it, at the proposal of the Head of Compliance.
- 3 The Code of Conduct is disclosed internally to the Group's Employees on the Intranet and externally on the Bank's website within ten days of its implementation and respective revisions.

¹ Who is also responsible for Regulatory Compliance in matters relating to the prevention of corruption and related offenses.

Annex I - Declaration of Awareness of the Code of Conduct

Declaration of Awareness of the Code of Conduct

I, [full name], in the capacity of [position/function], hereby declare that I have fully understood, accept and comply with the Banco Finantia Group's Code of Conduct, a copy of which was delivered to me, as approved by the Board of Directors of Banco Finantia, S.A., on [dd/mm/yyyy], and undertake to respect and comply with the rules and procedures resulting therefrom.

[Place and date]

[Signature]