

Statement of Anti-Money Laundering (AML) and Counter-Terrorist Financing (CTF) Policy

Having in mind the importance to defend its name and reputation and duly respect its Clients, Banco Finantia SA. (“Finantia”), its subsidiaries, the members of the Management Board and all employees fully adhere to the high standard and international principles to prevent and fight against money laundering and terrorism financing.

Finantia operates in investment banking, private banking and corporate finance areas and is under the supervision of Banco de Portugal who responds to the European Central Bank. Finantia and its subsidiaries also comply (group policy) with all the other competent authorities that have supervisory responsibilities on the jurisdictions where Finantia subsidiaries are registered, namely, the United Kingdom (FCA) and, the United States (SEC and FINRA).

The Finantia AML policy is designed to comply with the requirements and obligations set out in the EU legislation, regulations, rules and industry guidance for the financial services sector, and includes:

- > The appointment of a Money Laundering Reporting Officer with adequate seniority and experience, who has the responsibility to oversight and legal frame all the relevant activities.
- > Defining and maintaining, customer due diligence identification and verification procedures before entering into any relationship, offering any product or providing any financial service, including confirmation on the identity of the ultimate beneficial owner.
- > Due diligence procedures completed to know the customer (KYC), which includes, detecting

and applying enhanced due diligence to Politically Exposed Persons (PEP) and other individuals that matter to the PEP universe, and all other natural persons or entities that are somehow related (nexus) to countries or territories publicly noted with higher money laundering or terrorist financing risk.

- > Ensure to track relevant operations, by performing ongoing monitoring and surveillance, to detect and report suspicious activity.
- > Identification and verification of all other natural persons or entities, including the payer and the payee of any bank transference received or instructed by clients, in order to be able to identify the beneficiary or owner of the funds.
- > Maintaining an efficient system of record keeping, including e-mail retention, phonographic business recordings, relevant documentation and all other supports that ensure Finantia obligations to show evidence for at least 7 years following the end of the relationship.
- > Ensuring a comprehensive AML training to its front, middle and back office employees, management and board of directors, and with that, nurturing a group culture of awareness and vigilance to safe perform.
- > Ensuring an internal audit function and an independent external audit to its policy, procedures and controls that, annually results on a report available to the supervisor.

Finantia does not promote any product or financial service that offers anonymity, not maintains relation with shell banks, and does not tolerate any form of crime, namely bribery and corruption.