

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, and private banking areas, and is under the supervision of Banco de Portugal and the European Central Bank. Finantia and its subsidiaries comply (Group policy) with all the other relevant Authorities that have supervisory responsibilities at the jurisdictions where Finantia subsidiaries are registered, namely, the Financial Conduct Authority in the UK, Securities and Exchange Commission, and Finra in the US, and Banco de España in Spain.

The Finantia AML Policy is designed to comply with the legal requirements set out of the EU, UK and US Regulation and industry guidance and standards for the financial services sector, that include:

- > 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 program [KYC] before and after entering into any relationship, offering any product or providing any financial service, including verification of the identity of the ultimate beneficial owner.
- > Applying enhanced due diligence to detected Politically Exposed Persons (PEP) and other eligible individuals relevant to PEP universe, and all other natural persons or entities that

are somehow related (nexus) to jurisdictions publicly noted with higher money laundering or terrorist financing risk, or any other eligible for enhanced due diligence considering their risk profile.

- > 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, and applying enhanced due diligence procedures to correspondent banking services.
- > 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, does not maintain relation with shell banks, and does not tolerate any form of crime, namely bribery and corruption.

March 15th 2021