

Statement of Sanctions Policy

Banco Finantia S.A. (“Finantia”) is an independent bank, with more than 30 years of experience, specialized in the areas of investment and private banking.

Finantia and its affiliates (“Finantia Group”) that engage in relation\transaction with clients and counterparties are aware and comply with the obligations that result from sanctions programs approved by relevant Authorities.

For that matter are consider relevant the sanctions programs approved by the European Union Counsel, by the Security Counsel of the United Nation, by the President of the United Sates (Dept. of the Treasury\OFAC) and by the United Kingdom HM The Treasury\OFSI.

Whenever necessary other relevant sanctions programs are also considered.

For Finantia Group, sanction compliance considers tacking action and have in place procedures and controls

- > That follow with sense of urgency the new and updated sanctions programs approved and maintained by the relevant Authorities namely, those who have impact on financial services, asset freezing, client admittance or maintenance, and investment decisions;
- > That maintain updated on a daily bases the relevant official sanctions lists used for automatic risk detection;

- > That ensure ongoing routines, supported by adequate risk detecting tools, before and after onboarding individuals and entities that due to their qualifications (e.g. clients, their representatives, beneficial owners, and all other relevant and related);
- > That enable transactions surveillance routines, aim to detect, and preventively control, any operation that may have its objective to respect the rules or any sanction implemented;
- > That ensure sanction securities monitoring, by identifying and verifying the securities intended to be include on its or its customers portfolio, and ensuring adequate regulatory tackling in order to prevent inadequate transactions and mitigate value impact.

These procedures and these controls are also applicable to the implicit (and not exempt) sanctioned persons and entities, having in consideration criteria of direct or indirect control.

Finantia may have to report to the competent authorities, any activity considered suspicious that may violate approved sanctions or to be obliged to comply with acts of asset freezing or any other mandatory sanctions obligations.

March 15th 2021