

Banco Finantia (“Finantia”) is an independent bank, specialized in the areas of investment banking and private banking. Finantia is aware and complies with the obligations that result from sanctions approved by relevant authorities that target countries, terrorist activities and those involved in proliferation and use of chemical weapons and cyberattacks. For that matter Finantia considers relevant authorities: The European Union Counsel, The Security Counsel of the United Nations, and whenever relevant, other authorities, namely the U.S. Department of the Treasury\ OFAC and in the U.K. HM The Treasury\OFSI.

Finantia also ensures that its affiliates who have also adhere to this group policy, fully comply all rules and regulations approved by the relevant authorities.

Finantia follows and implements the UE regulations and the UN resolutions regarding restrictive measures and sanctions, maintains with sense of urgency, an update procedure of the lists were are named natural persons and entities and other groups subject to the acts approved, and ensures that all its activities comply with these obligations and do not engage on prohibited activities or transactions.

Finantia before and after onboard anyone with whom may establish relationship or a transaction, regardless the capacity of his intervention (customer, or counterparty, representative, or beneficial owner, issuer, borrower or guarantor) ensures verifications to confirm that they are not listed or somehow affected by any sanction, and

implements the limitations, prohibitions or mandatory acts that on any circumstance must ensure to comply.

This due diligence also applies to the implicit (and not exempt) sanctioned persons and entities, having in consideration the criteria of direct or indirect control.

Finantia has in place a transaction surveillance system, aim to detect, prevent and control its objective to respect the rules or any sanction implemented.

Finantia also completes procedures on sanction securities monitoring, by identifying and verifying the securities intended to be include on its or its customers portfolio. In addition, maintains the adequate procedures to detect any legal or regulatory change that may affect any issuer.

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 obligation.