Banco Finantia

Banco Finantia Group Code of Conduct

September 24, 2026

Banco Finantia

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Chapter I
Scope and Objectives

Article 1 - Scope of Application

This Code of Conduct (the **"Code**") applies to members of the corporate bodies, senior management and all other employees of Banco Finantia, S.A. (the "**Bank**"), including employees of its Spanish branch, as well as to members of the corporate bodies, senior management and employees of companies directly or indirectly controlled by the Bank (collectively, the "**Group**" or the "**Banco Finantia Group**").

This Code also applies to service providers engaged by any Group entity where justified by the nature of the services performed. All persons within the scope of this Code are collectively referred to as "Employees" for its purposes.

Article 2 - Objectives

The purpose of this Code is to:

a Establish the principles, values, and rules of professional conduct that should guide the actions of the Group's Employees, promoting a culture of ethics, integrity, and responsibility;

b Define the guiding principles and internal standards governing Employees' relationships with customers, suppliers, competent authorities, counterparties and other stakeholders;

c Promote respect for and compliance with applicable laws, regulations and guidelines issued by competent authorities, and internal policies, including those related to the prevention of corruption and related offences;

d Establish the expected conduct of Employees, as well as the mechanisms and procedures for preventing, controlling, reporting and addressing situations that may constitute a breach of this Code;

e Contribute to strengthening the culture of compliance, good governance, and best practices in business conduct within the Group;

f Contribute to the implementation of the Group's Criminal Risk Prevention Programme.

Chapter II
Professional Conduct

Article 3 - General Principles

1 Group Employees must conduct themselves in accordance with rigorous standards of integrity, honesty, competence, responsibility and professional ethics, both in internal relations and in their dealings with customers, suppliers, competent authorities, counterparties and any other entities with which they interact in the performance of their duties.

2 The principles set out above are particularly relevant to Employees who, by virtue of their duties, have access to inside or confidential information, operate in financial markets, process

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personal data or sensitive information, participate in procurement processes, or have direct contact with customers.

3 The Group's ethical culture is based on compliance with applicable laws and regulations and with internal policies and procedures, as well as on adherence to the Group's corporate principles and values, particularly respect for confidentiality, impartiality in customer relationships and loyal cooperation with the competent judicial, tax and administrative authorities.

4 The Group promotes a safe and inclusive work environment by adopting the prevention and protection measures provided for in applicable occupational health and safety legislation.

Article 4 - Non-discrimination and Equal Treatment

1 The Group promotes a work environment based on respect for human dignity, diversity, equal treatment and opportunities, and non-discrimination.

2 Employees must respect the dignity, beliefs, characteristics, and personal choices of each individual, refraining from any form of discrimination, harassment, or unjustified unequal treatment.

3 No Employee may be favoured, disadvantaged, deprived of any right or exempted from any duty on grounds including ancestry, age, sex, sexual orientation, religion, political or ideological beliefs, race, language or place of origin.

Article 5 - Harassment in the Workplace

1 The Group does not tolerate any form of harassment, nor, in general, any behaviour that may constitute abuse of authority, discrimination, or workplace violence, whether committed by Employees or against them, by colleagues, suppliers, customers, partners, or any other persons with whom they interact in the performance of their duties.

2 Employees must refrain from engaging in any behaviour that could constitute harassment and must promote a work environment based on respect, dignity, courtesy, and mutual cooperation.

3 Harassment means any unwanted conduct, particularly conduct based on discriminatory grounds, occurring during recruitment, employment, work or vocational training, with the purpose or effect of disturbing or intimidating a person, violating their dignity, or creating an intimidating, hostile, degrading, humiliating or destabilising environment.

4 Employees who become aware of or have reasonable grounds to suspect a situation of harassment must report it as soon as possible to the *Compliance* Department. Whenever the situation involves employees of the *Compliance* Department, the report must be made to the Human Resources Department at or through the internal reporting channels and channels for reporting irregularities made available by the Group.

5 The Group ensures that all reported situations are investigated and will take appropriate disciplinary action whenever instances of harassment are confirmed, ensuring the protection of whistleblowers and witnesses against any form of retaliation, except in the case of willfully false reports.

6 All Employees involved in internal procedures relating to harassment must act in good faith, confidentially, discreetly and impartially, must maintain professional secrecy and must not

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engage in retaliation. They must refrain from disclosing any information obtained through their involvement in such procedures.

Article 6 - Corporate Image and Reputation

1 In performing their duties, Employees must act professionally, diligently, loyally and with integrity, thereby helping to protect the Group's corporate image, credibility, good name and reputation. Their conduct must reflect the Group's values and principles in internal relationships and in dealings with customers, investors, competent authorities, supervisory authorities and other third parties.

2 Employees must refrain from any behaviour that could harm the reputation or credibility of the Banco Finantia Group and must report, in accordance with applicable internal policies, any situations that may pose a significant reputational risk.

3 Without prejudice to Employees' individual rights of civic and political participation, no donations, sponsorships or other financial or economic benefits may be provided on behalf of, or for the account of, the Group to political parties, candidates for political office, election campaigns or party-political organisations, unless expressly permitted by applicable law and duly approved by the competent bodies.

Article 7 - Regulatory Compliance and Risk Tolerance

Employees must perform their duties with diligence, technical competence, and a sense of responsibility, in compliance with applicable laws, regulations and guidelines issued by competent authorities, and internal policies.

Accordingly, Employees must:

a Comply with and promote compliance with the laws, regulations and internal policies applicable to their activities, refraining from engaging in or suggesting any non-compliant acts, transactions, or conduct;

b Act in accordance with the governance model, internal control system, and risk tolerance levels defined by the Group.

Article 8 - Competition Law

Employees must comply with competition law and must not adopt or participate in practices that may restrict, distort or harm competition. Such practices include agreements or concerted practices, including the exchange of commercially sensitive information on prices, business volumes or market shares, or other sensitive strategic information.

Article 9 - Professional Conduct

In the performance of their duties, Employees must act with professionalism, integrity, diligence and loyalty towards the Group.

In particular, Employees must:

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a Use the Group's image, name, or brand exclusively for professional and authorised purposes;

b Perform only those duties for which they are duly authorised and, where applicable, certified;

c Refrain from making any judgments or comments on legal, tax, or financial matters that go beyond the information they are required to provide to customers when marketing financial products;

d Refrain from using their position or duties to obtain benefits for themselves or third parties;

e Refrain from pursuing, for their own benefit or that of third parties, business opportunities that belong or may belong to the Group;

f Safeguard and diligently use the Group's assets, resources, and information;

g Keep all records and documents relating to their professional activities properly organised and filed;

h Maintain and develop the knowledge and skills necessary to perform their duties by participating in training and awareness programmes promoted by the Group;

i Review and familiarize themselves with internal memos intended to raise awareness of the risks associated with non-compliant behaviour.

Article 10 - Duty of Confidentiality

1 Employees are bound by professional secrecy and must not disclose, transmit or use information concerning the Group's business or its relationships with customers, except in the ordinary course of performing their duties, as required by law, or pursuant to a final court judgment.

2 The duty of confidentiality extends to the disclosure of information to other employees of the Bank or the Group who do not need or should not have access to such information to perform their duties.

3 Any information or knowledge to which Employees have access in the course of their professional activities and that is considered confidential must not be used for their own benefit or that of third parties. Confidential information includes, by way of example, reports, accounts, balance sheets, objectives, Employees' personal data, and/or customers' transactions and positions.

4 The duty of confidentiality does not cease upon the termination of their respective duties or the provision of services; Employees must return all confidential information in their possession, as well as the devices on which such information is stored.

Article 11 - Conflicts of Interest

1 Employees must avoid any and all situations or activities in which their interests may interfere, in any way, with the interests of the Group or its customers.

2 Employees must promptly notify the Compliance Department whenever they identify an actual or potential conflict of interest, so that appropriate measures can be implemented to manage and resolve it effectively.

3 Employees must ensure that transactions in which Group entities participate and that involve related parties are conducted under arm's length terms.

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4 The procedures set forth in this article apply, with the necessary adaptations, to transactions with related parties.

5 Employees must comply with the internal rules in force regarding conflicts of interest, specifically the provisions set forth in the "Banco Finantia Group Conflict of Interest Policy" and in the "Policy on the Prevention, Disclosure, and Resolution of Conflicts of Interest Involving Related Parties," and must comply with applicable legal, regulatory and contractual provisions.

Article 12 - Gifts, Hospitality and Other Benefits

1 Employees may not solicit, receive, or accept, for themselves or for third parties, any benefits, rewards, compensation, advantages, or offers that exceed a purely symbolic value, in accordance with social customs and practices, that may influence—or appear to influence—their independence, impartiality, or objectivity in the performance of their duties.

2 The acceptance of offers, benefits, or advantages is permitted only under the terms and within the limits established in the *"Banco Finantia Group Conflict of Interest* Policy" and *the "Banco Finantia Group Anti-Corruption Policy*," and Employees must comply with their respective obligations to report any offers or rewards received to the *Compliance* Department.

3 Group Employees may not offer any gifts, benefits, rewards, or any other type of invitation, favour, or advantage to third parties that do not comply with the principles and limits established in the policies referred to in the preceding paragraph.

Article 13 - Intellectual and Industrial Property

1 Employees must respect and protect the intellectual and industrial property rights of the Group and third parties, refraining from reproducing, copying, distributing, modifying, transferring, disclosing, or using protected content without proper authorisation.

2 Employees must use the equipment, systems, information, and other resources made available to them in a prudent and responsible manner, exclusively for professional purposes or other expressly authorised purposes.

3 The Group's assets, resources, and databases, including information regarding to customers, suppliers, partners, or other entities, may not be used for purposes other than those for which they were created or made available, nor for personal gain or the benefit of third parties.

Article 14 - Sustainable Development and Environmental Responsibility

1 The Group conducts its business in a socially responsible manner, promoting practices that contribute to the responsible management of the environmental, social, and economic impacts associated with its activities.

2 Employees must ensure the conservation, maintenance, and efficient use of the resources made available to them, complying with legal regulations, procedures, and internal recommendations regarding sustainability and the responsible management of resources, with the aim of minimizing the environmental impact of the Group's activities.

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Chapter III
Digital Conduct

Article 15 - Information Governance and Security

1 Employees must use the technology resources and information systems provided by the Group responsibly and securely, and solely for legitimate purposes connected with the performance of their duties.

2 Employees must ensure the preservation, integrity, availability and confidentiality of the information to which they have access, complying with internal policies regarding information security and information organisation, in order to ensure strict compliance with their duty of confidentiality and the security of information.

3 Employees are required to be familiar with and comply with the policies, procedures and other internal rules regarding the use of information systems and information security, specifically the “Information Security Policy,” the “ICT Acceptable Use Policy,” and the “Employee Handbook,” and are committed to strictly adhering to them.

Article 16 - Use of Social Media

1 The Group respects freedom of expression and all other rights established by law.

2 Employees must use social media responsibly and in a manner consistent with the Group’s principles and values, refraining from engaging in behaviour that could harm its image, reputation, or legitimate interests.

3 Whenever they identify themselves as Group Employees, or when such affiliation is public or easily identifiable, Employees must ensure that their posts cannot be interpreted as official positions of the Group, unless they are duly authorised to do so.

4 Whenever they identify themselves as Group Employees on social media, Employees must maintain a neutral and responsible stance consistent with the Group’s principles and values, refraining from any behaviour, comment, or post that could compromise the Group’s reputation, credibility, or institutional image.

Article 17 - Use of Artificial Intelligence Systems

1 Employees must use Artificial Intelligence Systems responsibly, ethically and in compliance with laws, regulations and internal policies, ensuring the protection of personal data, confidential information and other interests of the Group.

2 Employees must ensure that information generated by artificial intelligence systems is subject to human review and validation before it is used in decision-making, external communications or processes affecting customers, the Bank or third parties.

3 Employees must immediately report to the Systems & Telecommunications Department any security incidents, misuse, or operational anomalies related to Artificial Intelligence systems, in accordance with applicable internal procedures.

4 Employees must be familiar with and comply with the policies, rules and procedures regarding the use of Artificial Intelligence (AI) systems, specifically the “Policy on the Responsible Use

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of Artificial Intelligence (AI) Systems at the Banco Finantia Group," and must report any violations of internal rules to the Compliance Department.

Chapter IV
Relationships with Customers

Article 18 - Duty of Loyalty and Impartiality

1 Employees must act with loyalty, integrity, impartiality and professionalism in their dealings with customers or third parties, fostering relationships based on trust and respect.

2 Employees must refrain from any action or influence that could compromise their independence, objectivity, or impartiality in the performance of their duties.

Article 19 - Protection of Customers

1 Employees must act in the best interests of customers, in accordance with applicable law and the Group's internal rules and policies.

2 Employees must provide customers with clear and complete information about the products and services offered, so as to enable them to make informed decisions.

3 Employees must ensure that customers, whenever they request it, receive information about the transactions carried out.

Article 20 - Customer Complaints

1 The Group recognises customers' right to submit complaints and is committed to handling them diligently, impartially and within the applicable time limits, in accordance with applicable laws and regulations.

2 Employees must cooperate in complaints handling and comply with established internal procedures and deadlines.

Chapter V
Special Duties

Article 21 - Integrity, Prevention of Money Laundering and Corruption

1 The Group applies a zero-tolerance approach to corruption, bribery, fraud, money laundering, terrorist financing and other forms of financial crime, and promotes a culture of integrity, transparency and strict compliance with applicable laws and regulations.

2 Employees must act with honesty, integrity, diligence and good faith, refraining from participating in, facilitating, tolerating, or covering up conduct that may constitute legal, regulatory, or internal violations.

3 Employees must comply with the internal procedures established by the Group regarding the prevention of money laundering and terrorist financing, the prevention of corruption, and the

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management of financial crime risks, specifically, in this Code, in the "Policy on the Prevention of Money Laundering and Terrorist Financing," and in the "Banco Finantia Group Anti-Corruption Policy," actively collaborating in the identification, prevention, mitigation, and reporting of risk situations.

Article 22 - Whistleblowing and Irregularity Reporting Channels

1 Employees must report in good faith, through the appropriate channels, any facts, behaviours, or circumstances of which they are aware and that may constitute a violation of legal, regulatory, or internal provisions, or pose a risk to the Group and its customers.

2 The Group maintains appropriate arrangements for receiving, assessing and following up reports of breaches and irregularities, ensuring the confidentiality of whistleblowers' identities and protection from retaliation in accordance with applicable law.

3 The reports referred to in the preceding paragraph must be submitted and will be processed in accordance with the "Policy on Channels for Reporting Violations and Irregularities."

Article 23 - Relations with Public and Supervisory Authorities

1 The Group and its Employees shall cooperate diligently and transparently with the competent public and supervisory authorities, in accordance with applicable law.

2 Requests from competent authorities for information, documents or other action must be reviewed by the Legal Department and the Compliance Department before any response is provided.

3 In their interactions with public authorities, Employees must act with rigour, honesty, transparency and respect for the applicable legal and regulatory framework.

Article 24 - Relations with Suppliers, Service Providers and Other Third Parties

1 The Group seeks to establish relationships with suppliers, service providers, and other third parties who adhere to standards of integrity, professional ethics and compliance with applicable laws and regulations.

2 Employees involved in the selection, hiring, or evaluation of the entities referred to in the preceding paragraph must act independently, objectively, and transparently, observing the principles of legality, integrity, transparency, objectivity and good faith, complying with applicable internal procedures, and ensuring adequate management of the legal, regulatory, operational, reputational and corruption risks associated with the respective relationship.

3 It is prohibited to use suppliers, service providers, or other third parties to engage in, facilitate, conceal, or circumvent conduct prohibited by the legal, regulatory, or internal provisions applicable to the Group.

4 Employees must report to the *Compliance* Department any situations that may constitute conflicts of interest, irregularities, requests for undue advantages, indications of improper or illegal conduct, or any other situations that could compromise the integrity of relationships established with third parties.

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Article 25 - Relations with the Media and External Parties

1 Employees must refrain from disclosing to the media and other external entities, either on their own initiative or at the request of third parties, any news or information regarding Banco Finantia or any entity that is part of the Group.

2 Any external communication must be notified in advance and approved by the person duly authorised to do so under the applicable internal rules.

Article 26 - Employees' Personal Transactions

1 Employees engaged in activities that may give rise to a conflict of interest, or who have access to inside information or other confidential information, must not carry out personal transactions, or advise or request another person to transact in financial instruments, where this would involve the unlawful use or improper disclosure of inside or confidential information or would prejudice the Group's interests.

2 Without prejudice to the provisions of the preceding paragraph, the procedures regarding personal transactions set forth in the "Banco Finantia Group Conflict of Interest Policy," as in effect from time to time, must be followed.

Article 27 - Prohibition on Transactions Based on Inside Information

1 Employees must refrain from conducting, advising on, or promoting personal transactions in financial instruments when they possess inside information or other confidential information whose use or disclosure is prohibited by law or by applicable internal regulations.

2 Employees subject to restrictions in this regard must comply with the procedures and controls set forth in the "Banco Finantia Group Conflict of Interest Policy."

Article 28 - Outside Activities

1 Employees may not engage in activities outside the Group, whether remunerated or not, that are incompatible with their employment, specifically:

a if the functions are legally considered incompatible with those performed within the Group;

b being carried out in a manner that interferes with compliance with the work schedule established by the Group or with any obligations arising from the employment contract;

c compromising the impartiality and objectivity required for the performance of their duties within the Group.

2 Any outside activity must be notified in advance to the Human Resources Department and the Compliance Department for assessment, recording and ongoing monitoring of any incompatibilities, conflicts of interest or other restrictions.

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Article 29 - Data Protection

1 Employees must ensure the protection of personal data and confidential information to which they have access in the performance of their duties, acting in accordance with applicable law and the Group's internal policies.

2 Employees may only access, use, process, or disclose personal data and confidential information when necessary for the performance of their duties and to the extent permitted by law.

3 Any incident, loss, unauthorised access, or suspected breach involving personal data or confidential information must be reported immediately through the internal channels defined for this purpose in the "Personal Data Protection Policy."

Chapter VI
Compliance with the Code, Disciplinary Powers and Criminal Liability

Article 30 - Compliance with the Code

1 The Compliance Function promotes awareness of this Code, monitors its implementation and compliance, and proposes any updates it considers necessary.

2 This Code is part of the Group's set of internal policies and must be known and observed by all Employees.

3 Compliance with this Code does not preclude or replace compliance with applicable laws, regulations and other internal policies.

4 Employees must report to the Compliance Department any instances of non-compliance or well-founded suspicions of non-compliance with this Code and shall not be subject to retaliation for making such reports in good faith.

5 Questions regarding the interpretation or application of this Code should be directed to the Compliance Department.

Article 31 - Disciplinary Powers

1 Non-compliance with the provisions of this Code may constitute a disciplinary offense, in accordance with applicable law and the Group's internal policies.

2 Similarly, Group Employees who fail to report violations or who knowingly provide false or misleading information regarding acts or omissions of which they are aware, and which may expose the Group to acts of corruption and related violations, are subject to the disciplinary sanctions provided for in the Portuguese Labour Code or in equivalent labour legislation applicable to the Group's various subsidiaries.

3 In exercising its disciplinary authority, the Bank may impose the disciplinary sanctions provided for by law, which—without prejudice to the provisions applicable in jurisdictions other than Portugal, where the Group operates or may come to operate—are as follows: reprimand, formal reprimand, financial penalty, loss of annual leave, suspension from work with loss of pay and seniority, and dismissal without notice or compensation.

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4 The imposition of disciplinary measures does not preclude any civil, administrative or criminal liability that may apply to the case.

Article 32 - Criminal Liability

1 In the performance of their duties, Group Employees must refrain from engaging in any conduct that could constitute a criminal offense.

2 Without prejudice to the application of the disciplinary sanctions mentioned in the preceding article, and to any civil and/or administrative liability applicable to the case, in the event of non-compliance with rules established in this Code of Conduct that give rise to criminal liability, criminal sanctions may also be imposed.

3 In the specific case where such non-compliance is associated with acts of corruption and related offences, this refers to the crimes provided for in the applicable criminal legislation in each jurisdiction; in Portugal, these are punishable by a fine or imprisonment, as detailed in Annex II of the "Banco Finantia Group Anti-Corruption Policy," without prejudice to the provisions applicable in jurisdictions other than Portugal, where the Group operates or may come to operate.

Chapter VII
Final Provisions

Article 33 - Acknowledgement Declaration

1 All Employees must declare that they have read and understood this Code of Conduct, as well as any amendments thereto, by signing a declaration or through another appropriate electronic means.

2 The Human Resources Department is responsible for collecting and maintaining the respective acknowledgement records.

Article 34 - Training

1 Employees must diligently participate in training and awareness-raising activities and commit to the internal or external training courses offered to them, with the aim of equipping them with the technical skills and the ethical and professional knowledge necessary for the full performance of their duties.

2 The Group promotes training and awareness programmes, in both classroom-based and e-learning formats, designed to ensure understanding of the principles, values and rules of conduct set forth in this Code, as well as the consequences of non-compliance.

3 The programmes referred to in the preceding paragraph are provided on joining the Group and, thereafter, at least every two years, without prejudice to the conduct of additional programmes whenever deemed necessary, particularly as a result of relevant changes to this Code or to the applicable legal and regulatory framework.

4 Attendance at training and awareness sessions is mandatory, and the Human Resources Department is responsible for maintaining a record and monitoring compliance with the training obligations set forth in this Code.

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Article 35 - Approval, Review, Monitoring and Publication

1 This Code is approved by the Bank's Board of Directors, following a prior opinion from the Audit Committee and on a proposal from the Head of the Compliance Function[1].

2 The Code shall be subject to periodic review, to be conducted at least every two years or whenever changes warrant such a review.

3 The Compliance Function is responsible for monitoring compliance with this Code, conducting periodic risk-based reviews, and reporting the results to the appropriate bodies.

4 The Code of Conduct and any amendments to it are made available to Group Employees through the intranet and on the Bank's website within 10 days of their approval.

[1] Who also performs the role of Regulatory Compliance Officer for matters relating to the prevention of corruption and related offence

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