

Banco Finantia Group Anti-Corruption Policy

Index

1	Purpose.....	3
2	Scope of Application.....	4
3	Key Definitions	4
4	Regulatory Compliance Programme.....	6
5	Functions of the Regulatory Compliance Officer for the Prevention of Corruption and Related Offences.....	7
6	Standards of Conduct.....	9
	6.1 Offer and/or Acceptance of Benefits (hospitality, gifts and invitations).....	9
	6.2 Donations	10
	6.3 Conflict of Interest.....	11
	6.4 Relations with Public Authorities	11
7	Commitment of Third Parties	11
8	Whistleblowing Channels	12
9	Disciplinary Responsibility	12
10	Prohibited Conduct with Corruption Risk	12
11	Training	12
12	Legal Framework.....	13
13	Approval, Revision and Publication	14
	Annex I - Declaration of Awareness of the Anti-Corruption Policy.....	15

1 Purpose

Banco Finantia, S.A. is an independent Iberian-based bank, with registered office in Lisbon and over 30 years of local and international experience, specialising in Private Banking and Corporate and Investment Banking. The Bank has a branch in Spain - *Banco Finantia, S.A, Sucursal en España*, and holds a full or majority interest in several companies, its subsidiaries, all of which together are hereinafter referred to as the "**Group**" or "**Banco Finantia Group**").

Corruption, in any of its forms, offends fundamental principles, in particular those of equality, transparency, free competition, impartiality, legality, integrity and the fair distribution of wealth, so it is urgent to adopt all possible preventive measures to minimise the risk of its occurrence.

In addition, the practice of corruption or related offences may expose Banco Finantia Group, as well as the respective members of the governing bodies, directors and other employees, to criminal and civil liability, and may cause significant reputational and financial damage to the Group and third parties.

Today, anti-corruption policies are given a prominent place in all sectors of society, including banking, as instruments for building a fairer, more egalitarian and inclusive society and for re-establishing solid bonds of trust between customers and the banking sector.

In this framework, and in order to strengthen an ethical and regulatory compliance culture and to reject any corrupt practice, the Bank's Board of Directors approves this **Banco Finantia Group Anti-Corruption Policy** (hereinafter, the "**Policy**"), which is an integral part of the Bank's Regulatory Compliance Programme and which complements the Group's Code of Conduct and Conflict of Interest Policy on this subject.

This Policy has as its main objectives:

- a) Strengthening commitment to the prevention, detection and repression of corruption, cooperating with the competent authorities in the fight against corrupt practices in all their forms;
- b) Improving knowledge, training and institutional practices on transparency, ethics, loyalty and integrity;
- c) Guiding the Group's actions by respecting and complying with the law and other regulations in force at all times in this regard;
- d) Ensuring before Customers, suppliers and other stakeholders that the Group exercises its duties of vigilance and control over its activity, establishing adequate measures to prevent and/or mitigate the practice of this type of crime;
- e) Developing the provisions contained in the **Banco Finantia Group Code of Conduct**.

Due to the complexity of the phenomenon of corruption, the existence of this Policy does not prejudice the adoption of additional controls resulting from more demanding standards or legal obligations in this area.

2 Scope of Application

This Policy is applicable to members of the governing bodies, managers and other employees of Banco Finantia and companies that are, directly or indirectly, controlled by it, as well as service providers of any of these entities, when the nature of their functions justifies it (hereinafter jointly and generically referred to as "**Employees**").

The Policy is applicable in any territory or jurisdiction, national or international, where the Banco Finantia Group carries on its business, without the need for a subsidiary, branch or permanent establishment therein.

3 Key Definitions

For the purposes of this Policy, "**corruption and related offences**" are defined as the *crimes of corruption, receiving and offering undue advantage, embezzlement, economic participation in business, extortion, abuse of power, prevarication, influence peddling, money laundering, and fraud in obtaining or diverting a subsidy, grant or credit*, as described in the applicable legislation:

- a) "**Corruption**": A request, promise, offer or acceptance, directly or indirectly, of any undue advantage, pecuniary or otherwise, for oneself or for a third party, motivated by the practice or omission of one or more licit or illicit acts;
- b) "**Receiving and offering undue advantage**": The direct or indirect request, promise, offer or acceptance of any undue advantage, pecuniary or otherwise, likely to create a "climate of permeability" favourable to the agent's intentions, motivated by the functions exercised by the beneficiary;
- c) "**Embezzlement**": The unlawful appropriation or use, for one's own benefit or for the benefit of a third party, of any property that has been delivered, is in the possession of or is accessible to a public official by reason of the functions exercised;
- d) "**Economic Participation in Business**": The damaging of property interests or the receiving of property as a result of an act relating to property interests, in the context of legal transactions, which the person causing the damage had, by reason of their functions, the duty to administer, supervise, defend or carry out;
- e) "**Extortion**": The receipt by a public official of an undue advantage, or an advantage in excess of that which is due, through the inducement into error or by taking advantage of an error on the part of the victim, as well as through the use of violence or threats involving serious harm;
- f) "**Abuse of power**": The abuse of powers or the violation of duties inherent to the functions by a public official, with the intention of obtaining, for oneself or a third party, an illegitimate benefit or causing harm to another, which cannot be framed in another criminal offence;
- g) "**Prevarication**": The omission or practice of an act against the law, within the scope of a procedural enquiry, judicial proceeding, administrative infraction or disciplinary proceeding, by a public official in the exercise of powers arising from the office they hold;

- h) **"Influence Peddling"**: The direct or indirect request, promise, offer or acceptance of any undue advantage, whether pecuniary or not, for oneself or for a third party, intended to repay the abuse of the influence, real or alleged, of the beneficiary with a public entity;
- i) **"Money Laundering"**: The conversion, transfer, aid or facilitation of any operation for the conversion or transfer of advantages, obtained by oneself or a third party, directly or indirectly, for the purpose of disguising their illicit origin, or to prevent the author or participant in such offences from being criminally prosecuted or subjected to a criminal reaction;
- j) **"Fraud in obtaining a subsidy or grant"**: obtaining a subsidy or grant by providing the competent authorities or entities with inaccurate or incomplete information about oneself or a third party and concerning facts important for the granting of the subsidy or grant, omitting, against the provisions of the legal regime of the subsidy or grant, information on facts important for its granting, or using a document justifying the right to the subsidy or grant or facts important for its granting, obtained through inaccurate or incomplete information;
- k) **"Misappropriation of subsidy, grant or subsidised credit"**: The use of benefits obtained as a subsidy or grant for purposes other than those for which they are legally intended, as well as the use of the benefit obtained as a subsidised credit for a purpose other than that provided for in the credit line determined by the legally competent entity;
- l) **"Fraud in obtaining credit"**: The submission of a proposal to grant, maintain or modify the conditions of a credit intended for an establishment or company, by providing inaccurate or incomplete written information intended to accredit it or important for the decision on the application, by using documents relating to the economic situation that are inaccurate or incomplete, or by concealing deteriorations in the economic situation that have occurred in the meantime in relation to the situation described at the time of the credit application and that are important for the decision on the application.

For the purposes of Portuguese criminal law, the expression "**official**" covers:

- a) Civilian and military public servants;
- b) Those holding public office by virtue of a special bond;
- c) Whoever, even provisionally or temporarily, in return for payment or free of charge, voluntarily or compulsorily, has been called upon to perform or to participate in the performance of an activity comprised in the public administrative or judicial function;
- d) Judges of the Constitutional Court, judges of the Court of Auditors, judicial magistrates, magistrates of the Public Prosecution Service, the Attorney General of the Republic, the Ombudsman, members of the Supreme Judicial Council, members of the Supreme Council of the Administrative and Fiscal Courts and members of the Supreme Council of the Public Prosecution Service;
- e) An arbitrator, juror, expert witness, technician who assists the court in judicial inspection, translator, interpreter or mediator;

- f) A notary;
- g) Whoever, even provisionally or temporarily, in return for remuneration or free of charge, voluntarily or compulsorily, performs or participates in the performance of a public administrative function or exercises functions of authority in a juridical person of public utility, including private charitable institutions; and
- h) Anyone performing or participating in the performance of public functions in a public association.

The following are equivalent to "**official**":

- a) The members of the management or administrative body or supervisory body and the employees of public companies, nationalised companies, companies with public capital or with majority public capital participation and also companies contracting public services. In the case of companies with equal or minority public capital participation, the members of the management or administrative body appointed by the State or by another public entity, shall be treated in the same way as employees;
- b) Magistrates, officials, agents and alike of public international law organisations, regardless of nationality and residence;
- c) National officials of other States;
- d) All those who exercise functions identical to those described in paragraph 1 within the scope of any international public law organisation of which Portugal is a member;
- e) Magistrates and officials of international courts, provided that Portugal has declared that it accepts the jurisdiction of those courts;
- f) All those exercising functions in out-of-court dispute resolution procedures, regardless of nationality and residence;
- g) National jurors and arbitrators from other States.

Public administration officials and holders of high public and political office shall conduct the performance of their functions in accordance with the defined rules of ethics, act impartially and in accordance with the law and act in such a way as to strengthen the confidence of citizens in the integrity, impartiality and effectiveness of public authorities.

Therefore, they should not use their position and public resources to their advantage or take advantage of their position to serve individual interests, avoiding that their private interests collide with their public duties.

4 Regulatory Compliance Programme

Decree-Law 109-E/2021 of 9 December, which created the National Anti-Corruption Mechanism and established the General Regime for Prevention of Corruption, introduces a series of new obligations applicable to all legal persons registered in Portugal employing 50 or more employees

and to branches in national territory of legal persons registered abroad employing 50 or more employees.

Among the new obligations, the **creation of a Regulatory Compliance Programme** stands out:

- > A **Risk Prevention Plan (RPP)**, encompassing the entire organisation and activity of the organisation, whose objective is, on the one hand, to identify, analyse and classify the risks and situations that may expose the entity to acts of corruption and related offences and, on the other hand, to specify the preventive and corrective measures aimed at reducing the probability of occurrence and the impact of the risks and situations identified;
- > A **Code of Ethics and Conduct**, establishing the organisation's principles, values and standards of professional ethics, and identifying both the risks of its exposure to such offences and the disciplinary sanctions applicable in the event of non-compliance;
- > A **Whistleblowing Channel**, which allows the monitoring of whistleblowing of acts of corruption and related offences, in accordance with the General Regime for the Protection of Whistleblowers;
- > A **Training Programme** that instructs managers and employees as to the policies and procedures implemented by the organisation for the prevention of corruption and related offences, taking into account the different degrees of exposure to the risks identified.

To ensure the effectiveness and efficiency of these instruments, internal control systems, prior assessment procedures and regular evaluation systems will be implemented.

The Bank's Board of Directors is responsible for the adoption and implementation of the Regulatory Compliance Programme, which applies to the whole of Banco Finantia, S.A., and, in a general, transversal and extensive manner, to all the activities developed by the Group.

To this end, a **Regulatory Compliance Officer** must be appointed to guarantee and supervise the implementation of the Regulatory Compliance Programme, ensuring that they are provided with both the internal information and the human and technical resources necessary for the proper performance of their duties, and to establish an evaluation system covering the internal control and monitoring mechanisms for the implementation of the risk prevention plan, in order to assess its effectiveness and ensure its improvement.

5 Functions of the Regulatory Compliance Officer for the Prevention of Corruption and Related Offences

This Policy is an integral part of a set of internal rules of the Banco Finantia Group that Employees must be aware of and failure to comply with is punishable.

Notwithstanding the responsibility of the Bank's Board of Directors to ensure that each Employee is made aware of the Anti-Corruption Policy in force, it is the responsibility of the appointed Regulatory Compliance Officer to promote the implementation, execution, monitoring, compliance and updating of this Anti-Corruption Policy.

Within this context, and without prejudice to others that may be attributed to them by legal or internal regulations, the responsibilities and functions of the Regulatory Compliance Officer are:

- 1 To structure and regularly review the Regulatory Compliance Programme;
- 2 To supervise the operation and correct performance of the Regulatory Compliance Programme, carrying out the following tasks:
 - a) Know and disseminate internally the crimes of corruption and related offences, listed in Article 3 of the RGPC;
 - b) Promote awareness among all Employees of the legislation in force to which the Bank is subject as regards corruption, as well as the use of the channels for reporting irregularities to report any risks related to this type of crime;
 - c) Publicise internally the necessary information on the existing risks of committing crimes of corruption and related offences and promote the diligence and prevention measures that should be adopted to avoid them;
 - d) Promote the identification, by the areas of activities in which they may be committed, of crimes of corruption and related offences that should be prevented;
 - e) Regularly assess the knowledge of Banco Finantia Employees on the risks of committing crimes of corruption and related offences and on measures to prevent them;
 - f) Ensure that the preventive and corrective measures that are identified to reduce the probability of occurrence and impact of the risks and situations identified in the RPP are implemented.
- 3 Keep the internal documents for which they are responsible up to date, taking into account both internal changes (for example, organisational changes, changes in business lines, activities undertaken, etc.) and changes arising from the applicable regulatory framework, proposing the appropriate changes to the Board of Directors;
- 4 Request the necessary and appropriate financial, human and material resources for the adoption and implementation of reasonable and proportionate measures, in accordance with the size of the Banco Finantia Group, to prevent the commission of crimes;
- 5 Ensure that complaints and reports received regarding corruption and related offences are properly processed, investigated and concluded with due procedural safeguards;
- 6 Propose the instigation of disciplinary procedures in the event of failure to comply with legislation or internal rules in this area;
- 7 Periodically verify the Regulatory Compliance Programme and its possible modification when there are relevant violations of its provisions, or when changes

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occur in the participated companies, the control structure or the activity developed, which make them necessary;

- 8 Periodically inform the Board of Directors on the status of the Regulatory Compliance Programme, the reports received through the existing channels regarding acts of corruption and related offences, as well as the actions carried out and/or planned with respect to anti-corruption;
- 9 Collaborate with public authorities in the course of any investigation that may arise, including of a criminal nature, in this area.

The Regulatory Compliance Officer is also responsible for issuing recommendations to prevent corruption that are not provided for in this Policy, whenever the risk of corruption in a specific situation is high, and for drawing up evaluation reports and/or any other operation designed to assess compliance with this Policy by Banco Finantia Group Employees.

Compliance with the rules set out in this Policy does not replace or prejudice the obligation of Employees to comply with the duties and obligations arising from the law, regulations or other applicable internal rules concerning the matters covered by this Policy.

Employees must inform the Regulatory Compliance Officer whenever they become aware or have reasonable suspicions of violating this Anti-Corruption Policy, or of behaviour which may indicate non-compliance with it, and must act in accordance with criteria of reasonableness and prudence and not thereby be prejudiced in any way.

The Regulatory Compliance Officer shall be responsible for providing the management and supervisory bodies of each of the companies in the Group with information on possible breaches of the rules set out in this Policy, of which they become aware, by Employees.

The monitoring of this Policy is thus ensured by the Regulatory Compliance Officer, who will take the measures they deem appropriate, including reporting to the competent judicial authorities, taking into account the inherent risk of each situation and the respective mitigation measures implemented.

Requests for clarification of doubts about the interpretation or application of this Anti-Corruption Policy should be addressed to the Group's Regulatory Compliance Officer.

6 Standards of Conduct

6.1 Offer and/or Acceptance of Benefits (hospitality, gifts and invitations)

Persons covered by the scope of this Policy may not solicit, receive or accept any offers, benefits, gifts, compensation or advantages, including travel or hospitality, for themselves, their family, friends or any other persons or organisations with whom they have a personal, business or political relationship, which may affect, or appear to affect, impartiality and objectivity in the exercise of their functions.

It is considered that there is an impediment to impartiality and objectivity in the exercise of functions when there is acceptance of goods that exceed a merely symbolic value, namely goods

with an estimated value equal to or greater than €100.00 (one hundred euros) or equivalent in another currency, and for this reason, Employees must follow the procedure in force described in the ***Banco Finantia Group Conflict of Interest Policy*** and declare this, in writing, to the Compliance Department.

Group Employees are free to accept benefits that are compatible with the institutional nature of the relationship in question, or which represent socially appropriate conduct in keeping with custom, namely:

- > Advertising objects of a promotional nature whose value is minimal or insignificant (e.g. diaries, calendars, pens, notebooks, key rings, mugs, etc.);
- > Invitations to meals and/or events of an institutional, professional or promotional nature, provided that they are occasional and in accordance with social customs and courtesy;
- > Gifts or attention of low value, understood as those that do not exceed €100.00 (one hundred euros) or equivalent in another currency. To calculate this value, all gifts or invitations offered by the same person (natural or legal) within a period of one year must be taken into account. It should be noted that gifts in cash or equivalent, as well as their acceptance, are strictly prohibited under any circumstances.

Any gift or invitation accepted or made by a Banco Finantia Group Employee must also comply with the following requirements:

- > Not be contrary to the law and/or any of the Group's internal rules;
- > Not have been previously requested;
- > Not consist of cash, gift cards, cheques or any similar donation involving the giving of a sum of money, regardless of value;
- > Not have been offered or accepted by a public entity or official;
- > Not have been made with the intention of influencing the decision-making, objectivity and/or independence that should govern the professional activity of all Group Employees and/or third parties with whom they are related.

Whenever this exceeds the merely symbolic amount defined above, Banco Finantia Group Employees must follow one of the following procedures and inform the Compliance Department:

- i. Return to the offeror the donations received;
- ii. Revert the donations to a charitable institution, provided that it is not related to the offeror or the Employee.

6.2 Donations

As part of its social responsibility and the cultural patronage regime, the Banco Finantia Group may grant donations to institutions for social, cultural or similar activities.

If donations exceed the amount of EUR 7,500 (seven thousand five hundred euros) they must be authorised by the Bank's Board of Directors.

Donations to political parties or election campaigns, by the Group or any of its Employees, on its behalf, are strictly prohibited, under the terms of Articles 8 and 16 of the Law on the Financing of Political Parties and Election Campaigns.

6.3 Conflict of Interest

Employees must avoid any situation or activity in which their interests may interfere, in any way, with the interests of the Banco Finantia Group or its customers, and comply with the internal rules in force on conflicts of interest, namely the provisions of ***Banco Finantia Group Conflicts of Interest Policy*** and the ***Policy on Prevention, Communication and Remedy of Conflicts of Interest involving Related Parties*** and comply with the applicable legal, regulatory and contractual provisions.

6.4 Relations with Public Authorities

Banco Finantia Group Employees must relate to public authorities, bodies and institutions, as well as public officials, in an ethical, lawful and respectful manner. This relationship must be based on cooperation, and respect the provisions of the ***Banco Finantia Group Code of Conduct***, in particular those contained in Articles 12, 21 and 23.

It is forbidden to make so-called "***facilitation payments***", i.e. to give sums of money or gifts to public officials in order to expedite certain administrative procedures, obtain licences, services or others.

This prohibition must be respected even if, in any of the countries in which the Banco Finantia Group operates, such payments are socially accepted and even customary.

7 Commitment of Third Parties

Third parties with whom the Banco Finantia Group has a contractual relationship must take all necessary measures to combat corruption that may arise within the scope of their operations.

In this regard, third parties with whom Banco Finantia Group has a relationship must adopt ethical standards similar to those of the Group, which express a strict commitment to anti-corruption practices.

The Regulatory Compliance Officer may establish a set of requirements and procedures in order to ensure the suitability of potential business partners and assess whether there is any possibility, even if residual, of acts of corruption. In this case, controls should be established in order to mitigate this risk.

Third parties who cannot prove compliance with these standards must adhere to the Banco Finantia Group's corporate principles and values in order to ensure transparency in their actions, in particular the adoption of an anti-corruption policy.

Similarly, depending on the risk involved in the business relationship, the Banco Finantia Group may require compliance with other additional controls.

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8 Whistleblowing Channels

In order to ensure the effective application of the provisions of this Policy, Banco Finantia Group has **Whistleblowing Channels**, which allow all Employees to report, among other practices, any illegal or irregular activities that indicate non-compliance with this **Anti-Corruption Policy** or any internal rules in force in the Group, in order to prevent or stop such practices from causing financial or reputational damage to Banco Finantia Group or even incurring criminal, civil or misdemeanour liability.

The communications referred to in the previous paragraph must be made and shall be processed under the terms of the **Whistleblowing Policy**, and the Employee may submit the report anonymously whenever they wish.

In any case, confidentiality will always be ensured in the handling of the report, and the employee reporting it, as well as the witnesses indicated by them, cannot be disciplined or suffer any kind of disadvantage or reprisal as a result of such report, unless they act with intent or on the basis of false declarations.

9 Disciplinary Responsibility

Breach of the provisions of this **Anti-Corruption Policy** by Group Employees constitutes an offence liable to lead to disciplinary proceedings.

Employees of Banco Finantia Group who fail to report breaches or who provide false or erroneous information regarding acts or omissions of which they are aware and which may expose the Group to acts of corruption and related breaches, are subject to the application of sanctions of a disciplinary nature provided for in the Portuguese Labour Code, or equivalent labour legislation, applicable to the Group's different subsidiaries.

10 Prohibited Conduct with Corruption Risk

In the exercise of their functions, Employees of the Banco Finantia Group must refrain from any conduct typically capable of constituting the commission of a crime, in particular those relating to acts of corruption and/or related offences.

Without prejudice to the disciplinary responsibility mentioned in the previous paragraph and to the applicable civil and/or misdemeanour liability, in the event of non-compliance with the rules established in this Policy that implies criminal liability, the criminal sanctions legally foreseen may also be applied.

11 Training

The Banco Finantia Group will provide training and/or awareness-raising for its Employees at the beginning of their functions and at least every two years, except in cases where, by determination of the Regulatory Compliance Officer, due to material changes to the content of this Policy, greater frequency is required.

These actions, in face-to-face and/or e-learning format, are on the subject of the combatting and prevention of corruption, the rules of conduct in force, the consequences that may result from

improper conduct and alert to the importance of the duty to report, which are detailed in the ***Training Programme within the Scope of the Regulatory Compliance Programme***.

Training and/or awareness-raising activities are compulsory, and it is the responsibility of the Human Resources Department to keep a record of Employees' attendance.

12 Legal Framework

International:

- a) Convention against Corruption, adopted by the United Nations General Assembly, ratified by Portugal on 28 September 2007;
- b) Convention on Combating Bribery of Foreign Public Officials in International Business Transactions, of the Organisation for Economic Cooperation and Development, ratified by Portugal on 23 November 2000;
- c) Convention on the fight against corruption involving officials of the European Communities or officials of Member States of the European Union, ratified by Portugal on 3 December 2001;
- d) Council of Europe Criminal Law Convention on Corruption, ratified by Portugal on 7 May 2002;
- e) Additional Protocol to the Council of Europe Criminal Law Convention on Corruption, ratified by Portugal on 12 March 2015;
- f) Council Framework Decision 2003/568/JHA of 22 July 2003 on combating corruption in the private sector;
- g) Recommendation of the Council for the Prevention of Corruption, concerning Plans to Prevent Risks of Corruption and Related Offences, of 1 July 2015;
- h) EBA Internal Governance Guidelines (EBA/GL/2021/14) of 22 November 2021.

Portugal:

- a) Criminal Code, approved by Decree-Law no. 400/82, of 23 October;
- b) General Regime for the Prevention of Corruption, approved by Decree-Law No. 109-E/2021, of 9 December;
- c) Criminal Liability Regime for Corruption Crimes in International Trade and Private Activity, approved by Law No. 20/2008 of 21 April;
- d) Law on the Financing of Political Parties and Electoral Campaigns, approved by Law 19/2003 of 20 June;
- e) Crimes of Responsibility of Holders of Political Offices, approved by Law No. 34/87, of 16 July;

- f) Anti-Economic Offences and Offences against Public Health, approved by Decree-Law no. 28/84, of 20 January;
- g) General Regime of Credit Institutions and Financial Companies, approved by Decree-Law no. 298/92, of 31 December;
- h) Securities Code, approved by Decree-Law 486/99, of 13 November;
- i) Bank of Portugal Notice no. 3/2020.

13 Approval, Revision and Publication

This Anti-Corruption Policy, and its successive revisions, are approved by the Board of Directors of Banco Finantia upon the proposal of the Regulatory Compliance Officer.

This Policy shall be subject to regular review, to be carried out at least every three years and whenever there are changes in the applicable legislation, as well as whenever there are changes in the duties or organic or corporate structure of the Group that justify this, at the proposal of the Regulatory Compliance Officer.

The Policy shall come into force as from its publication and shall be disseminated internally to Group Employees, through the intranet and externally through the Group's website.

Annex I - Declaration of Awareness of the Anti-Corruption Policy

Declaration of Awareness of Anti-Corruption Policy

I, [full name], in the capacity of [position/function], hereby declare that I have full knowledge of, accept and respect the Banco Finantia Group Anti-Corruption Policy, having been given a copy of it, as approved by the Board of Directors of Banco Finantia, S.A., on [dd/mm/yyyy], and undertake to respect and comply with its provisions.

[Place and date]

[Signature]