

Sanctions Compliance Statement

Banco Finantia S.A. (“Finantia”) is an independent bank, with more than 35 years of experience, specialized in the areas of investment and private banking.

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

For that matter, the sanctions programs approved by the European Union, by the United Nations, by the United States of America and by the United Kingdom are considered relevant.

Whenever necessary other relevant sanctions programs are also considered.

For Banco Finantia Group, sanctions compliance considers taking action and have in place procedures and controls

- > That follow with a sense of urgency the new and updated sanctions programs approved and maintained by the relevant Authorities namely, those who have an impact on financial services, asset freezing, client admittance or maintenance, and investment decisions.
- > That maintain updated on a daily basis the relevant official sanctions list used for automatic risk detection and transaction blocking.
- > That ensure ongoing routines, supported by adequate risk detecting tools, before and after onboarding individuals and entities that can be considered relevant due to their qualifications (e.g. clients, their representatives, beneficial owners, and all other relevant and related).
- > That enables surveillance routines

designed to prevent the execution of any operation that may infringe an active prohibition set out under an applicable sanctions programme.

- > That ensure sanction securities monitoring, assessing the security and its issuer prior to execution to prevent sanction violation and/or circumvention.

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.