



BANCO INTERATLÂNTICO, S.A.
SANCTIONS POLICY

November 19, 2025



1. DEFINITION

In compliance with the legal, regulatory and best practices recommendations issued by relevant international entities regarding Anti-Money Laundering and Counter Terrorism Financing (hereinafter abbreviated "AML/CTF"), Banco Interatlântico, S.A. (hereinafter BI) defined and implemented a clear set of policies, procedures and control systems in order to assess and mitigate possible risks inherent to its customers¹ and the business relationships established.

International sanctions are restrictive measures applicable to persons, entities and jurisdictions for the purpose of maintaining or establishing peace and international security, the protection of human rights, democracy and the rule of law, the preservation of national sovereignty and independence and other fundamental interests of the state, as well as the prevention of terrorism and the proliferation of weapons of mass destruction.

Restrictive measures are implemented by countries or international organisations that maintain lists of designated persons, groups or entities. These include, among others, the European Union in compliance with the Common Foreign and Security Policy (CFSP), the Sanctions Committee in accordance with the United Nations Security Council Resolutions (UNSCR), the Office of Foreign Assets Control (OFAC) and the Office of Financial Sanctions Implementation (OFSI).

Restrictive measures of a diplomatic nature: imposition of restrictions affecting diplomatic relations.

Restrictive measures on admission and movement: imposition of restrictions affecting the admission or movement of individuals (visa and travel bans).

Trade Restrictive Measures: the imposition of restrictions affecting trade relations between countries, including:

- Embargo on arms and related material of any kind, including weapons and ammunition, military vehicles and equipment, paramilitary equipment and their spare parts;
- restrictions on export and/or import of dual use goods and equipment, namely equipment which might be used for internal repression;
- embargoes on certain sectors (oil, gas, transport, etc.)
- prohibition and control of the provision of certain technical assistance or training, financing or financial assistance.

Financial restrictive measures: the imposition of restrictions that focus on Institutions, services and/or financial markets, including:

- freezing of funds and economic resources;
- restrictions on investment;
- prohibition of financial transactions.
- prohibition of financing and provision of financial and technical assistance, brokering services and other services related to prohibited activities.

¹ The concept of "Customer" shall be understood in a broad way, including business relationship customers, occasional transaction customers, customer representatives and authorized persons to act on behalf of the customer.



2. ENFORCEABILITY

The enforcing of the sanctions decreed constitutes an obligation for both the public and private sectors, affecting the activity of financial institutions such as Banco Interatlântico, S.A. (BI).

In Cape Verde there is no specific criminal regime for non-compliance with the financial or commercial sanctions imposed by the various international organizations, however in Portugal, the Law 97/2017 of 23 August 2017 - Regulates the implementation and enforcement of restrictive measures adopted by the United Nations or the European Union and establishes the penalties applicable to infringements of these measures.

As part of its activity, BI as a subsidiary of CGD, is bound by compliance with sanctions decreed by CFSP and UNSC, while ensuring compliance with the penalty systems in force in the jurisdictions where it operates, namely those enforced by OFAC and in accordance with the duties established by Laws No. 119/VIII/2016 and 120/VIII/2016 of 24 March.

3. GENERAL OPERATING PRINCIPLES

BI has implemented a sanctions programme that incorporates the international sanctions policy, which is managed by the Compliance Function Office (GFC), located in Cabo Verde.

GFC is responsible for assessing whether the sanctions policy is in conformity with applicable legislation and sanctions, while regularly monitoring its efficiency and promoting any changes necessary for its improvement.

BI has implemented a set of policies and procedures aimed at making sure the Institution does not establish or maintain business relations or processes any transactions for/on behalf of sanctioned persons, entities or countries.

In this regard, it filters customers and stakeholders in transactions, by checking them against the lists of sanctioned persons and entities issued by CFSP, UNSC and OFAC, OFSI among others.

BI has a customer acceptance policy that relies on a risk-based approach, having implemented an active system for the filtering of persons and entities when establishing business relationships.

It also filters its customer database on a regular basis and ensures the on online filtering of international inbound and outbound transfers.

If a person, entity or vessel included in the lists of international sanctions and restrictive measures is detected, BI will refuse to establish and/or maintain the business relationship and will refrain from carrying out operations in which they are involved.

As part of its system for the prevention of money laundering and combating the financing of terrorism, it has implemented integrated customer and transaction monitoring systems, whose warnings are examined by a technical team under GFC.

When establishing or maintaining banking correspondence relations with foreign banks, BI conducts the respective compliance risk analysis, consisting of the rating of all institutions and conducting a risk assessment



on those that entail high risk.

Employees in the area of compliance are regularly given adequate training, aimed at helping them understand and enforce the sanctions policy.

BI actively collaborates with both supervisory and legal authorities concerning the enforcement of sanction systems.