

Code

Origin

Version Entry into force

Title: **Compliance Policy**

Summary

This Policy establishes the minimum rules and procedures that shall be observed by ATLANTICO in terms of compliance risk prevention, identification, assessment and management.

Document assigned to:

Compliance Office

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1. PURPOSE

1.1. The purpose of this Policy is to ensure that ATLANTICO carries out its business in compliance with local and international laws and regulations that are applicable to it, as well as with ethical principles and in accordance with the best practices in the sector, aimed at ensuring the security of the business, providing a differentiated and excellent service to its customers, satisfying its employees and creating value for its shareholders.

1.2. This Policy also aims to manage Compliance Risk, define the organization, mechanisms and procedures that enable to: (i) reduce the probability of occurrences and/or events that occasion irregularities; (ii) quickly identify, report and resolve those that eventually occur; and (iii) demonstrate, where necessary, that the Bank has appropriate organization, procedures and measures in place to meet the above objectives.

2. REGULATORY BASIS AND SCOPE OF APPLICATION

2.1. This Policy was drafted in accordance laws that are applicable to the Prevention and Combat of the Crime of Money Laundering, Terror Financing and the Proliferation of Weapons of Mass Destruction and the Underlying Crimes, namely:

- Act Nr 05/20 of 27 January, Law on the Prevention and Combat of the Crime of Money Laundering, Terror Financing and the Proliferation of Weapons of Mass Destruction;
- Act Nr. 14/2021 of 19 May, Law on the General Regime for Financial Institutions;
- Notice Nr. 01/22 of 28 January, on Corporate Governance Code for Financial Institutions
- Notice Nr. 12/20 of 27 April, on the Opening, Operation and Closing of Simplified Accounts;
- Notice Nr. 14/20 of 22 June, on the Rules for the Prevention and Combat of Money Laundering, Terror Financing and Proliferation of Weapons of Mass Destruction;
- Instruction 20/20 of 9 December, on the Report on Prevention of Money Laundering, Financing of Terrorism and the Proliferation of Weapons of Mass Destruction; Risk assessment; Tools and Applications.;

3. INTRODUCTION

3.1. This Policy aims to define the key elements for the proper management and control of conduct and reputation risks that shall be observed by Banco Millennium Atlântico, S.A "ATLANTICO" or "Bank"), establishing management, internal controls and Compliance processes and procedures indicators.

3.1. This Policy is complemented by other current Policies and Regulations, namely: Conflict of Interest Management Policy, Transparency and Information Disclosure Policy, Client Identification and Acceptance Policy, Policy on Transactions with Related Parties, Prevention of Money Laundering and Terror Financing Manual, Internal Control Policy and the Code of Conduct and Ethics.

3.3 ATLANTICO's Compliance is conducted autonomously, independently and takes measures to proactively and periodically ensure compliance with legal and regulatory obligations, duties, policies and internal guidelines, with a view to detecting potential situations that may indicate any deviation from internal or external rules, fostering adherence to the principles of good conduct, acting as a second line of defense within the framework of the Internal Control System.

3.4. ATLANTICO has established the Compliance Department and appointed a Head of Department with sufficient powers for the office, who can provide direct information and regular advice to the Executive Committee and to the Board of Director.

3.5. Within the scope of Compliance operations, the Board of Director is responsible for approving this Policy.

4. MISSION OF COMPLIANCE

4.1. Compliance is concerned with defining, approving and implementing policies and processes to ensure that management, operational structures and all employees comply with the laws, rules and regulations (internal and external) that govern the Bank's activities in order to adequately manage compliance risk at the strategic and operational levels, as well as to avoid the risk of suffering legal or regulatory sanctions and financial or reputation losses and damage stemming from failure to comply with the laws, codes of conduct and rules of "good business practices" and duties to which the Bank is subject.

4.2. Compliance also aims to:

- a. Ensure effective management of risks associated with banking business;
- b. Regularly advise the Board of Directors on situations to which ATLANTICO or its employees may be subject Regularly advise the Board of Directors on situations in which ATLANTICO or its employees may be subject to infringement proceedings;
- c. Properly document processes associated with its field of business; and
- d. Participate in task forces with other departments of the Bank to develop approaches aimed at being compliant with internal and external regulatory norms.

5. PRINCIPLES

5.1. ATLANTICO bases its activity on a set of principles and values that guide its overall strategy, both in terms of market positioning and business security and stability, establishing its mark as a leading bank in Angola, namely:

- a. Leadership of the Board of Directors and Senior Management: the Board of Directors and Senior Management of the Bank participate directly in the establishment, definition, implementation and periodic review of the Compliance culture, processes and procedures and the Internal Control System;
- b. Responsibility of the Board of Directors and Employees: the Bank's Directors and Employees are responsible for running the day-to-day operations in accordance with regulatory norms and high ethical and professional standard;
- c. Reporting of the Compliance Office: the Compliance Office operates autonomously and independently, with full and unfettered access to the internal information of the Bank and shall report directly and solely to the Board of Directors;
- a. Access to information and cooperation: the Compliance Office, in its line of duty and within its powers, interacts with the other Management and Inspection bodies, the Bank's Organizational Units and external entities depending on their activities and operations that are being monitored;
- d. Authority and Independence: the Compliance Office has powers to suspend any transaction or process that it deems to contravene extant rules, as well as request any information it deems necessary and relevant for the full performance of its duties;
- e. Adequate resources: the Compliance Office has sufficient material and human resources, access to all operations, documents, information and controls relevant to the full exercise of its duties.

6. DUTIES OF COMPLIANCE

6.1. The duties of compliance have the following powers:

- a) Establish processes to detect and assess the risk resulting from non-compliance with ATLANTICO's legal obligations and duties, as well as correct detected deficiencies;
- a) Establish a work program that outlines the operations to be carried out and those planned by the hierarchy of the Bank, taking the risk involved into cognizance;
- b) Ensure updated records of all internal and external norms that the Bank has to comply with, clearly indicating who is responsible for their fulfillment;
- c) Ensure update of all shortcomings detected;

- e) Monitor and evaluate internal control procedures in issues related to the prevention of preventing money laundering, terror financing and the proliferation of weapons of mass destruction, as well as inform the competent authorities;
- e) Monitor compliance with the Bank's corporate governance policies, namely the Conflict of Interest Prevention Policy and the Code of Conduct and Ethics;
- f) Evaluate criminal activities detection prevention processes, including the prevention of money laundering, terror financing and the proliferation of weapons of mass destruction, as well as communicate with the competent authorities in this area, namely the Financial Information Unit (FIU).
- f) Prepare periodic reports for the Executive Committee and the Audit and Internal Control Committee on Compliance issues regarding the existence of indices or concrete situations of non-compliance with the rules of conduct in customer relations and on the situations in which the Bank or the employees may be subject to infringement proceedings;
- g) Prepare a global report on the exercise of Compliance, on an annual basis, for the Board of Directors, Executive Committee, Audit and Internal Control Committee and Supervisory Board, specifically containing:
 - A brief description of Compliance activities;
 - Conclusions of analysis conducted, identifying non-compliance observed and measures taken to correct them; and,
 - As recomendações para melhoria do exercício da função.
- h) Properly document processes associated with its area of operation; and,
- i) Participate in diverse development initiatives organized by the Bank's departments.

7. COMPLIANCE ORGANIZATIONAL STRUCTURE

7.1. In order to ensure efficient management of the Bank's activities, by minimizing compliance risk prevention and timely detection, the Compliance Department has adopted a decentralized structure under a Compliance Officer, comprising the following structure:

7.2. The compliance area is composed of the following units:

- a. Internal Support and Control; and,
- b. Norms, Processes and Policies.

7.3. The Anti Money Laundering area is composed of the following units:

- a. Monitoring and research; and,
- b. Operations analysis and Bank Correspondence.

8. COMPLIANCE INSTITUTIONAL STRUCTURE

8.1. Board of Directors

a. The Board of Directors is primarily responsible for ensuring compliance with the Bank's legal and regulatory obligations, as well as establishing, implementing and approving policies, standards and procedures, systems and controls aimed to mitigate compliance risk.

b. The Board of Directors shall also establish the necessary measures to ensure that the Compliance Office has the authority and independence to carry out its legally stipulated responsibilities, have adequate resources to carry out its duties, as well as access to all relevant Bank information for the proper performance its duties.

8.2. Three lines of defense model

ATLANTICO governance operates using the three (3) lines of defense model, which is subdivided into:

(i) business and support areas, which are responsible for identifying, assessing and controlling the risks inherent to their operations. The first line of defense needs to know and apply the policies and procedures, and have sufficient resources to do its work;

(ii) risk and compliance, which is the second line of defense and supervises the management of risk operations carried out by the first line, and is responsible for monitoring and supervising Compliance risks, the impact of risk exposure and the Bank's risk profile; and,

(iii) internal audit, which is the third line of defense, the main function of which is to assess the effectiveness and efficiency of the processes and procedures implemented in the management and control of internal audit Compliance

9. COMPLIANCE PROGRAM

9.1. The Compliance Office prepares its program of activities according to the type, complexity, structure, risk profile and business model of the Bank and includes the following key elements: (i) organization and governance; (ii) policies and procedures; (iii) risk identification and assessment; (iv) conduct of tests and assessments regarding compliance with laws and regulations; (v) advice and annual submission of the compliance report to the Board; (vi) (compliance training); and (vii) publication of regulatory norms, mainly aimed at managing Compliance risk.

9.2. The work program is supervised by the Audit and Internal Control Committee, which updates it, based on regulatory changes, in consonance with good practices and with the institutional risk profile assessment.

10. DISCIPLINARY PROCEEDINGS

Any breach of the rules provided for in this Policy by employees is deemed a disciplinary offense punishable under the terms of the applicable disciplinary system, without precluding any civil or criminal liability that such may incur.

11. REVIEW

This Policy shall be reviewed annually by the Compliance Office and/or whenever it so deems, sent for the verification of the Executive Committee, Audit and Internal Control Committee and approved by the Board of Directors

12. ENTRY INTO FORCE

This Policy shall be effective on the date of its publication and shall be disseminated to all employees, ensuring that they are aware of the rules set out herein as well as the implication of non-compliance.

Banco Millennium Atlântico

- Board of Directors -