



Luxembourg, June, 2026

To whom it may concern,

Subject: AML/CFT (Anti-Money Laundering & Countering the Financing of Terrorism) and ABC (Anti-Bribery and Corruption) Statement

Itaú Europe S.A. ("Itaú Europe" or the "Bank") is a credit institution incorporated under Luxembourg law of 5 April 1993 on the financial sector as amended and supervised by the Commission de Surveillance du Secteur Financier ("CSSF"). The Bank is subject to the Luxembourg law of 12 November 2004 on the fight against money laundering and terrorist financing, as amended, as well as applicable CSSF regulations and circulars, including but not limited to CSSF Regulation No 12-02 on the fight against money laundering and terrorist financing.

By this letter, we confirm that the Bank has established and maintains a robust AML/CFT framework proportionate to its business model and risk profile. This framework is implemented in accordance with Luxembourg and European legal and regulatory requirements and the Bank's internal governance arrangements, including its Compliance Charter and its AML Policy, together with supporting procedures

Key elements of our AML/CFT and ABC framework

1. Compliance function & independent audit assurance.

The Bank established a Compliance function responsible for the AML/CFT framework of the Bank in line with regulatory requirements, and the effectiveness of this framework is subject to independent assurance through the internal audit function.

2. Policies, procedures, and staff accessibility.

The Bank implemented AML/CFT policies and procedures that are kept up to date, approved in accordance with the governance of the Bank and available to employees.

3. Compliance Monitoring Program.



The Bank implemented a Compliance Monitoring Program to support ongoing compliance with applicable AML/CFT legal and regulatory requirements and internal standards.

4. **AML/CFT risk assessment.**

We perform and regularly update AML/CFT risk assessments covering the Bank's activities and lines of business.

5. **Customer Due Diligence (CDD).**

We perform CDD on all customers, including:

- conducting Know Your Customer ("KYC") controls prior to entering into a business relationship by identifying and verifying customers, beneficial owners and relevant related parties using reliable and independent sources; understanding ownership and control structures; assessing the purpose and intended nature of the relationship; and, where relevant, verifying source of funds and source of wealth;
- performing KYC renewals of onboarded customers following a risk-based approach;
- continuously screening customers and relevant related parties against applicable targeted financial sanctions and restrictive measures (including United Nations and European Union lists), as well as politically exposed persons ("PEP") lists, internal group restriction lists and adverse media sources;
- applying Enhanced Due Diligence ("EDD") measures for higher-risk customers and situations;
- monitoring customer activity and transactions on an ongoing basis and reporting suspicious activities to the competent Financial Intelligence Unit ("FIU") in accordance with applicable requirements and internal procedures.

6. **Anti-Bribery and Corruption**

The Bank addresses bribery and corruption risks as part of its overall Compliance framework through the implementation of applicable policies, procedures and controls. Appropriate measures are in place to prevent and detect such risks, including requirements relating to conflicts of interest, gifts and entertainment, and employee conduct. Employees are required to comply with applicable laws and internal policies and to report any suspected misconduct through established escalation channels. The effectiveness of these controls is subject to ongoing monitoring and independent review.



7. Training.

We provide AML/CFT and sanctions training to employees on a regular basis and deliver supplementary training, when deemed necessary, including for employees in relevant functions.

Governance and escalation (high-level comfort)

The Bank applies a three-lines-of-defense model with clear roles and responsibilities. Compliance operates as a permanent, independent second-line control function with escalation channels to senior governance bodies, and internal audit provides independent third-line assurance over the effectiveness of the control framework.

This statement is provided for information purposes only to support clients' and counterparties' due diligence. It does not constitute legal advice, does not create contractual rights or obligations, and may not be relied upon as a representation or warranty. Should you require further information, please do not hesitate to contact us.

Yours faithfully,

Joel Vergues

Head of Compliance

A handwritten signature in black ink, appearing to read "Joel Vergues", written over a diagonal line.