INTESA SANPAOLO
WEALTH MANAGEMENT
Suisse

To whom it may concern

Geneva, 26.08.2026

Anti-Money Laundering Comfort letter

We confirm that Intesa Sanpaolo Wealth Management SA is a Swiss company with its registered office in Geneva. Switzerland is a member of the Financial Action Task Force – FATF and implements the FATF recommendations.

Intesa Sanpaolo Wealth Management SA (the "Bank") is regulated as a bank by the local supervisory authority, the Swiss Financial Market Supervisory Authority - FINMA (www.finma.ch), in respect of the conduct of all its financial business activities. The Bank is a subsidiary of the Intesa Sanpaolo Group ("ISP") and is subject to consolidated supervision by ISP.

As a bank regulated in Switzerland, the Bank is subject to financial market legislation governing the combating of money laundering that includes the Anti-Money Laundering Act (AMLA), the FINMA Anti-Money Laundering Ordinance and the Agreement on the Swiss bank's code of conduct with regard to the exercise of due diligence, as amended supplemented or otherwise modified from time to time.

Compliance with these regulations is also verified on an annual basis by the group internal auditors and external auditors who communicate their conclusions to our local supervisory authority, FINMA.

The Wolfsberg Questionnaire and audited annual reports of the Bank are available on our website at www.intesasanpaolowm.ch under the section Legal Information. The list of the main shareholders of the Bank is available on both documents.

We confirm all Anti-Money Laundering checks have been carried out on all our clients and that:

- We maintain policies and procedures in accordance with applicable Swiss / FATF requirements to ensure we obtain evidence of the identity for all our customers who transact business through you or on whose behalf we transact business through you;
- All documentary evidence of the verification process will be retained for at least 10 years after the client has ceased his business relationship with us;
- We will make available to you, the Fund, or any competent authority, on request, copies of all AML and KYC relevant customer information and documentation in accordance with the Swiss Data Protection Act Applicable AML Regulations;
- We are satisfied that any funds which are remitted to you in connection with financial business conducted with you do not represent the proceeds of criminal conduct or terrorism activities;

- We acknowledge that you place reliance on our statements for your Customer Due Diligence (CDD) obligations it being understood also that we remain subject to Swiss laws and regulations;

We have identified and verified our customers and the beneficial owners and/or controlling persons:

- We confirm that we conduct transaction monitoring on customers and beneficial owners and/or controlling persons for the purpose of identifying potential suspicious activity and reporting to relevant authorities;
- We maintain Anti-money Laundering and Counter Terrorist Financing policies and procedures pursuant to Swiss regulatory requirements on the fight against money laundering as well as tax offences;
- We confirm that where the underlying investor(s) and their beneficial owner(s), (if applicable) are considered to be either domestic or foreign Politically Exposed Persons ("PEPs") or are close associates of PEPs, we apply Enhanced Due Diligence and ensure ongoing monitoring of the relationship;
- We confirm that we do not trade, nor do business, nor offer shares or accept orders to acquire shares, directly or indirectly, from shell banks or accept shell banks as underlying investors or beneficial owners;
- We confirm that we performed the following control on each of our employees: Control of identity documents, certificate from the relevant cantonal bankruptcy and prosecution office (certificate of non-prosecution), confirmation of non-criminal record from the Swiss Federal Office of Justice, World-Check, background and reference checks;
- We provide appropriate training on anti-money laundering and counter-terrorist financing requirements to all employees on a regular basis.

The Bank recognizes the paramount importance of maintaining strict compliance with international sanctions regimes. To this end, the Bank confirms: that it screens clients, transactions, and counterparties against relevant sanctions lists, including but not limited to those issued by the United Nations, the European Union, the United Kingdom, the United States Department of the Treasury's Office of Foreign Assets Control (OFAC), State Secretariat for Economic Affairs (SECO),:

- We have taken measures to ensure that our customers are neither individuals nor institutions which appear on applicable lists. In line with our Internal Policies and Procedures, we will inform you if we identify any sanctioned person holding participations with you.
- The Bank's sanctions screening program includes comprehensive checks against global and national sanction lists to ensure that no prohibited persons or entities are involved in transactions.
- The Bank has established and maintains internal policies and procedures designed to comply with applicable sanction laws and regulations and which are regularly reviewed to address regulatory changes and evolving sanctions risks.

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- Our sanctions compliance policy outlines clear procedures for identifying, reporting, and blocking transactions involving sanctioned individuals or entities, in accordance with applicable laws.
- The Bank employs internal controls and automated systems to identify transactions or clients that may involve sanctioned individuals or entities, ensuring compliance with all relevant sanctions regulations.
- All employees involved in client onboarding, transaction processing, and compliance undergo regular training on sanction requirements to ensure awareness and adherence to legal obligations.
- The Bank performs enhanced due diligence (EDD) on high-risk clients and counterparties, including those associated with jurisdictions or sectors subject to high sanctions risk, ensuring compliance with international and local regulations.
- The Bank conducts regular sanctions risk assessments as part of its overall AML/CFT (Countering the Financing of Terrorism) program to identify potential exposures to sanctioned persons, sectors, and jurisdictions.
- If any client or transaction is found to involve a sanctioned person or entity, the Bank is committed to taking immediate and appropriate action and has procedures in place to freeze or block assets, in compliance with applicable regulatory requirements e.g., OFAC, EU sanctions, SECO.
- In compliance with article 21 of the SECO Ordinance establishing measures in relation to the situation in Ukraine, the Bank continues to submit the mandatory declaration on clients falling in scope, both object of deposit restrictions and sanctioned persons.

Intesa Sanpaolo Wealth Management SA

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Chief Compliance Officer

Nathalie Zaharna
Head of AFC