



REGULATORY COMPLIANCE POLICY

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1. Introduction and Regulatory Framework

The Basel Committee on Banking Supervision published in April 2005 the document “Compliance and the Compliance Functions in Banks”, which states the requirements for banks to develop a Compliance Policy, as well as to regulate a function focused on the promotion of an adequate management of ‘Compliance risk’, defined as the risk of receiving legal or regulatory sanctions, or suffering material or financial or reputational losses as a result of the breach of laws, rules, standards, and codes of conduct applicable to their activities.

The European Banking Authority, EBA, published in 2017 its Guidelines on Internal Governance (EBA/GL/2017/11)¹ which establish the systems, procedures, and mechanisms that credit institutions should implement for internal governance according to article 74, section 1, of Directive 2013/36/EU to ensure an effective and prudential management of the entity. These guidelines have been updated on July 2021 (EBA/GL/2021/05). Through these guidelines, EBA establishes the standards which institutions should develop in terms of internal control, including the three functions that will apply and maintain the necessary culture both regarding risk control and internal compliance, within a solid and comprehensive control framework. These are the Risk Management, Compliance, and Internal Audit functions, which on an independent basis, will have access to the necessary material, human, financial, authority and information resources to allow the governing body to comply with their responsibility to apply a governance system which ensures an effective and prudential supervision and management of the company, as part of its risk management framework.

The updated EBA guidelines of 2021, strengthen the requirements in the control environment and internal governance of the entities that also have to encompass sound information technology systems, outsourcing arrangements and business continuity management. The guidelines highlight that identifying, managing and mitigating money laundering and financing of terrorism risk is part of sound internal governance arrangements and credit institutions’ risk management framework. Likewise, institutions should take into account environmental, social and governance (ESG) risk factors within their risk management framework.

¹ All the supervisors of the EU countries where Allfunds is present have endorsed these guidelines.

The Delegated Regulation (EU) 2017/565 implementing Directive 2014/65/EU on markets in financial instruments (MiFID II), establishes² that institutions should have deployed a permanent and effective compliance function which acts independently and supervises the effectiveness of measures, policies and procedures, advises those in charge of providing investment and ancillary services, reports to the governing body and supervises the processing of claims. Accordingly, the compliance function will establish a monitoring programme based on risks that ensures an exhaustive control.

In this regard, the European Securities and Markets Authority, ESMA, in its 2012 guidelines on certain aspects of the MiFID II compliance function requirements, updated on 2020, June 5th (ESMA35-36-1952), defines the compliance function as the function within an investment firm responsible for identifying, assessing, advising, monitoring and reporting to the governing bodies on the investment firm's compliance risk.

The Spanish Securities Market Act and its implementing regulations³ establish the requirements for entities providing these services to define and maintain a regulatory compliance function which acts independently and fulfils the required tasks. Circular 1/2014 of the Spanish Securities Market Commission (CNMV) on the internal organisation requirements and control functions, mention that the risks of regulatory breaches in the different business areas must be regularly identified and assessed and that a regulatory revision plan should be designed and regularly updated. This Circular also defines the responsibilities of the compliance function, especially in relation to advising and informing senior management and in terms of staff training.

This Policy, in compliance with the current regulations, implements the Compliance function within Allfunds, along with the key principles for compliance risk management, the description of its duties, liabilities and key processes.

Finally, the Allfunds' General Code of Conduct, which applies to all its employees and all the members of its governing bodies, establishes a series of ethical principles which must guide their actions, and sets the obligation to comply with the legislation in force from time to time, as well as with any applicable internal regulations and circulars in force. Moreover, the Code indicates that all of them must act in a lawful, ethical and professional manner

² Article 22

³ Royal Spanish Decree-Law 4/2015, of 23 October, approving the consolidated text of the Securities Market Act, last updated on 28 December 2018, and Royal Spanish Decree 217/2008 on the legal system of investment firms and other institutions that provide investment services, also updated on 28 December 2018, completing the transposition of MiFID II.

when performing their duties. Consequently, regulatory compliance is not a responsibility that belongs to an specific area or department within the organisation, but is part of its corporate culture, which starts from the top management, and becomes more effective when honesty, integrity and ethical standards are reinforced.

2. Objective and Purpose

This policy shall apply to Allfunds Bank S.A.U., including its shareholders, as applicable, subsidiaries, branches and representative offices (hereinafter “Allfunds” or the “Company”).

Allfunds is a *wealthtech* company with a leading positioning in the fund distribution industry. In the context of the evolution of technological services supporting financial institutions and especially those related to investment services, Allfunds offers its clients a business model regarding the distribution of undertakings for collective investment (UCI) including various investment and ancillary services, as well as digital services.

This policy aims to develop a compliance culture within Allfunds, as well as a solid framework to control compliance risks.

Allfunds governing bodies are responsible for promoting and maintaining a positive attitude towards risk and compliance control. To do so, they should establish, approve and monitor the implementation of effective policies to identify, manage and mitigate or avoid compliance risks in Allfunds.

The Compliance function promotes adherence to standards, supervisory requirements, good conduct principles and values, acting as the second line of defence, by establishing controls, standards and practices, promoting open, critical and constructive debate, providing advice and preparing the appropriate reports for the benefit of Allfunds and, therefore, of its employees, clients and shareholders.

The purpose of the Compliance function is to minimise the probability of breaches and irregularities, and to identify, assess, report and solve them promptly in case they occur.

3. Scope

This policy applies to all employees and management of Allfunds, thus including its branches, subsidiaries, and representative offices. It covers all business lines and units, including internal control functions and outsourced activities.

Notwithstanding the general nature of the scope of this Policy, based on the European supervisors' guidelines, the Compliance function as the second line of defence's main areas of action are highlighted below, (However, it is not intended to be exhaustive and notwithstanding the incorporation of other regulatory obligations in the future):

- Regulatory risk analysis and monitoring (Compliance Monitoring Programme development);
- Anti-Money Laundering and Counter Terrorist Financing (AML/CFT);
- Investor protection and transparency (rules of conduct, inducements, conflicts of interest, order and best execution, client's asset protection, minimum records, product governance, telephone recording, knowledge and competence of staff, etc.);
- Personal data protection (Data Protection Officer, Implementation of General Data Protection Regulation);
- Prevention of market abuse (internal code of conduct in the securities market);
- Prevention of conduct risk and reputational risk (General Code of Conduct, Antibribery policy, Annual mandatory Training);
- Prevention of criminal risk exposure (Corporate defence model and Compliance Monitoring Programme, General Code of Conduct, whistleblowing channel);
- Outsourcing functions and relationship with third parties (Outsourcing Policy, Registration and monitoring in accordance with the Outsourcing Guidelines issued by the European Banking Authority - EBA, participation in the Allfunds Group's Provider Selection Procedure);
- Product governance (actively assessing in design, implementation and decision-making processes, and in the control of products and services);
- Remunerations: the Regulatory Compliance function provides qualified advice to Allfunds' governing bodies regarding the design, application and effectiveness of its remuneration Policy;
- Customer complaints handling
- Relations with supervisory and regulatory bodies in the area of their competences.

- Other tasks related to compliance risk management (training, website content, business continuity, licences and activity reservations, regulatory reporting, corporate government, etc.).

4. Guidelines for Appropriate Compliance Risk Management

'Compliance risks' are defined as (1) the risks of regulatory breaches of the obligations defined by the applicable regulatory framework and (2) the risks of breaches of ethical codes, codes of conduct and internal regulations, which may result in sanctions, material or financial losses or damage to the company's reputation. Therefore, the Compliance risks encompass the regulatory risk, the reputational risk, the conduct risk, the money laundering risk and the criminal risk.

Allfunds' Board of Directors, the Boards of Directors of its subsidiaries, as well as their executives and management, should encourage the dissemination and promotion of the values and principles of action defined in this Policy, and, both its members and the rest of the employees, should assume compliance with them as the main criterion and guideline for their daily activity.

4.1. The leadership of the Board of Directors and Senior Management

Allfunds' Board of Directors and Senior Management will take part directly in the establishment and promotion of standards and practices, thus creating and transmitting a compliance culture and maintaining an effective control system based on an organisational structure adequate to Allfunds' size and complexity, with well-defined and independent lines of responsibility.

The **Board of Directors** will proceed to designate the responsibility for the Compliance function and will verify the content of the regular reports to be submitted through the Board of Directors' Audit and Risk Committee. Likewise, the Board of Directors through its Appointments and Remunerations Board Committee, appoints the responsible for the Compliance function.

The Board of Directors is in charge of approving the Regulatory Compliance Policy and the risk appetite.

The Compliance function shall inform the Board of Directors, at least once a year, of the methods and effectiveness of the controls on Allfunds' services and the risks that have been identified, as well as of the solutions implemented or to be applied.

The **Audit and Risk Committee of the Board of Directors** is responsible for overseeing the effectiveness of Allfunds' internal control systems, by reviewing them from time to time, in order to identify, manage and report the main risks. For the purposes of this Policy, the duties of this Committee include, but are not limited to, the following:

- Submitting the annual compliance report
- Controlling and overseeing compliance risks reviewing the results of the Compliance Monitoring Programme.
- Validating the Annual Compliance Plan, including the Compliance Monitoring Programme based on the risk assessment process.
- Status of inspections and requirements of supervisors
- Audit follow-up

The **Risk and Audit Committee**, together with the Chief Executive Officer (CEO) and the Global Heads of Risk Management, Compliance and Internal Audit, and the main business and support functions, is the body where the Compliance function regularly reports the results of the Compliance Monitoring Programme and the Annual Plan to the Company's Management.

4.2. Responsibility of managers and employees

Allfunds' managers and employees are responsible for carrying out their activities according to the regulations, requirements and guidelines for supervision, and to any other requirement or responsibility assigned to them.

Therefore, all employees and managers should understand their responsibilities while performing their activities and comply with the above mentioned requirements specifically applicable to their activities. In this regard, the duties of managers and employees will consist in:

- Applying the regulations in force and detecting possible situations of compliance risk.
- Including the regulatory compliance obligations in the business practices and procedures within their area of responsibility.
- Designing and applying adequate top-tier controls to ensure compliance with the before mentioned obligations.
- Actively taking part in the management and resolution of incidents and issues related to regulatory compliance.
- Ensuring the implementation of the necessary corrective actions reported by the control functions.
- Informing the Compliance function of the concerns, questions and failures of the compliance risk management system and practices.
- Taking part in training actions to which they are summoned regarding regulatory compliance.
- Integrating the degree of employees' regulatory compliance in the performance assessment system.
- Any other function they are specifically assigned in relation to compliance risk management or the regulations applicable to their scope.

Business and support lines constitute the **first line of defence** responsible for identifying, assessing and controlling the risks of non-compliance within their respective activities and functions. They must know and apply the policies and procedures and be prepared with sufficient resources to do so in an efficient way. As part of the first control line, policies and procedures must be clearly indicated in writing and be made available to all the people involved. They must include a clear description for employees, as well as outline their obligations and instructions and, where necessary, the guidelines on how to maintain Allfunds' activity in line with the applicable regulations.

4.3. Compliance function, the second line of defence

The Compliance function and the Risk Department make up the **second line of defence** at Allfunds. As such, this line will check that risks (including compliance risks) are managed in accordance with the risk appetite determined by Allfunds' governing body. It will also monitor and verify that the policies and procedures are observed and duly updated and identify improvement actions while promoting a solid risk and compliance culture across the organisation.

Allfunds' Compliance function is carried out by the Compliance Department, which is responsible for ensuring the correct management of compliance risks according to the principle of independence with respect to the areas or units which carry out Allfunds' activities and with the appropriate resources for this purpose.

The Regulatory Compliance unit shall establish, apply and maintain adequate procedures to detect any risk of non-compliance with Allfunds obligations and adopt measures to minimise the mentioned risks and facilitate the Supervisor's functions. The Compliance function should have an updated oversight and control programme on the services and activities provided by Allfunds, with the appropriate analysis, control tools and methodology.

Allfunds' Compliance Department is made up of the AML/CFT Unit and the Regulatory Compliance Unit, as well as of the local Compliance Officers of each subsidiary and branch. Most of the tasks mentioned in this policy related to the Compliance function are carried out by the Regulatory Compliance Unit and local Compliance Officers.

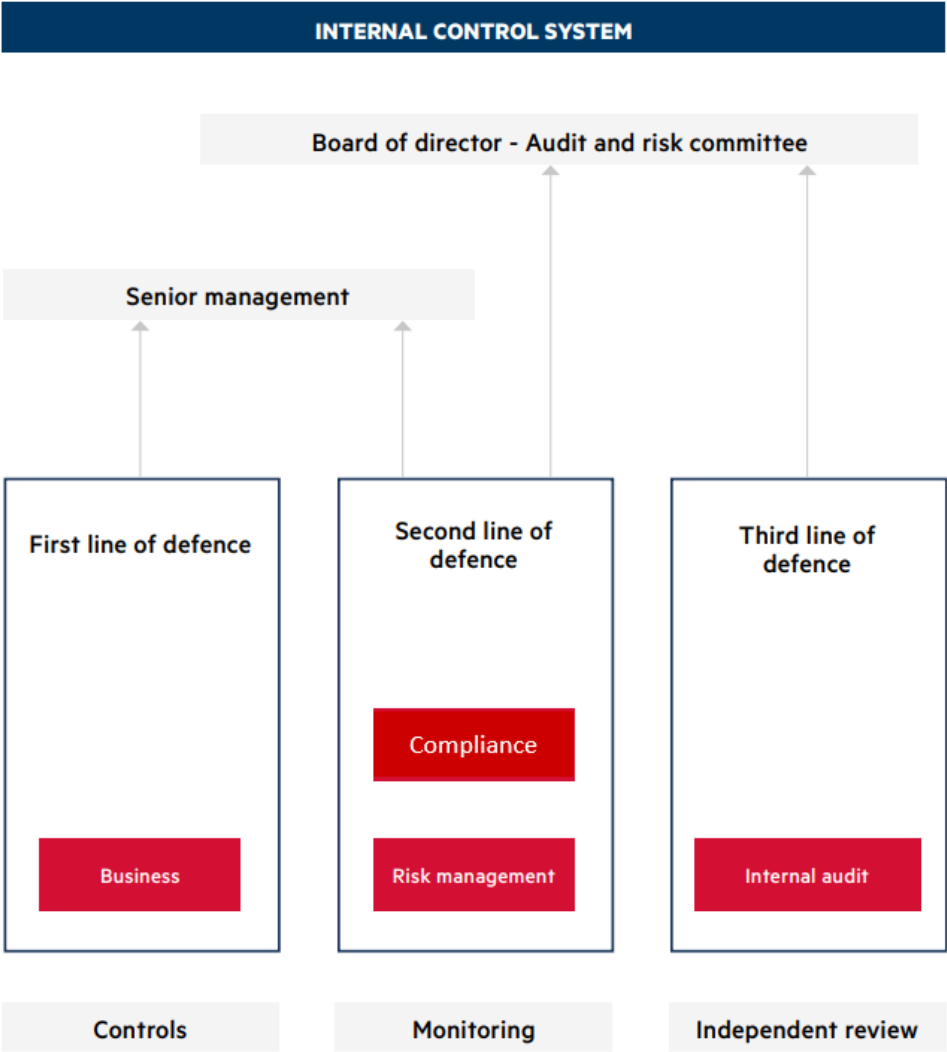
The activities and features of the Compliance function are defined in section 5.

The branches and subsidiaries of the Allfunds Group which, according to the regulations in force, require the existence of the Compliance function, shall establish and designate a local compliance officer.

The Compliance function of Allfunds Head Office shall establish the action lines, coordination, standardisation and control of the Compliance functions of branches and subsidiaries (local Compliance Officers), who shall establish direct functional reporting lines with the Compliance function of the Head Office, to ensure their independence, notwithstanding the jurisdiction in which they are located and their local reporting line.

4.4. Internal Audit, third line of defence

The Internal Audit function shall periodically assess, within an independent review framework, whether the policies, methods and procedures implemented by the first and second line are adequate and efficient, so that the compliance of the model and the effectiveness of the policies and procedures supporting them may be verified.



5. Compliance function.

5.1. Compliance purpose

The purpose of Allfunds' Compliance function has been defined following the supervisors' guidelines.

EBA⁴ guidelines establish that the compliance function should have *sufficient knowledge, skills and experience in relation to compliance and relevant procedures*. The compliance function *should be independent of the business lines and internal units it controls and have sufficient authority, stature and resources*. It must have sufficient capacity to cover the main tasks identified by EBA regarding the compliance function:

- *The compliance function should advise the management body on measures to be taken to ensure compliance with applicable laws, rules, regulations and standards, and should assess the possible impact of any changes in the legal or regulatory environment on the institution's activities and compliance framework.*
- *The compliance function should ensure that compliance monitoring is carried out through a structured and well-defined compliance monitoring programme and that the compliance policy is observed.*
- *The compliance function should also verify that new products and new procedures comply with the current legal framework and, where appropriate, with any known forthcoming changes to legislation, regulations and supervisory requirements.*

Moreover, reinforcing the MiFID's II approach, the ESMA guidelines on certain aspects of the MiFID II compliance function requirements⁵ stated that *"the compliance function is a crucial function within firms, responsible for identifying, assessing, monitoring and reporting on the firm's compliance risk."*

In particular, the ESMA highlights the *role of the compliance function in relation to certain specific topics, such as:*

- *the compliance function is assigned new and specific responsibilities in relation to MiFID II's product governance;*
- *the compliance function may also operate as the complaints management function of the firm;*

⁴ European Banking Authority. Guidelines on internal governance under Directive 2013/36/EU. EBA/GL/2017/11, updated on July 2021 EBA/GL/2021/05

⁵ ESMA 35-36-1952 guidelines on *certain aspects of the MiFID II compliance function requirements*, published on 5 June 2020 (ESMA35-36-1946) replacing ESMA Guidelines on the compliance function of 2012.

- *the compliance function shall also advise the management body of the firm on the firm's remuneration policy.*

As part of Allfunds' organisational culture, the Compliance function will give support to other departments of the organisation in the first line of defence (business and support departments), to identify and mitigate regulatory and reputational risks, thus promoting an ethical behaviour and a compliance culture.

Summarizing, **the purpose of Allfunds' Compliance function will be to identify, advise, supervise and report on compliance risks, carrying out their tasks independently, adopting a proactive approach and close to the rest of the organisation, as part of its culture, anticipating changes in the regulatory context, in order to incorporate them into the Compliance Monitoring Programme and mitigate regulatory, reputational, conduct, money laundering risk and the criminal risks while promoting ethical and responsible behaviour.**

5.2. Control and supervision activities

On a general basis, the supervision activities of the Compliance function consist in:

- Implementing a structured and well-defined Compliance Monitoring Programme based on a risk assessment process, which allows to regularly identify and assess the indicators and/or risk compliance controls.
- Designing a plan to review the policies and procedures in place.
- Ensuring the training and experience of employees so that they can adequately perform their duties, facilitating the staff receives adequate training in terms of compliance risks.
- Controlling the received complaints are correctly managed, considering them as a relevant source of information for their supervision tasks.
- Informing the management body and the Board of Directors in writing of the following aspects:
 - the structure, the reporting lines and the team that take part in the Compliance function, as well as any relevant changes thereto;
 - the effectiveness of the policies and procedures implemented within Allfunds to avoid and reduce compliance risks, including (i) an explanation of the supervision tasks carried out through the implementation of the Compliance Programme, (ii) the results obtained and the deficiencies found, and (iii) where applicable, the remediation measures applied;

- the training of the staff in terms of compliance and overseeing the qualification required to carry out their tasks;
- clients' complaints and measures taken;
- product governance, including the process to approve new products and services and their follow-up⁶ and the outsourcing services;
- Relevant changes in the applicable regulation and the measures applied to implement them;
- Correspondence with supervisors and regulators within their action scope.
- Providing a general approach with regard to the regular reports to supervisors, as well as controlling that the requirements of supervisors and regulators have been duly answered in time by the relevant areas, with the support of the Compliance function.

5.3. Advisory activities

On a general basis, the advisory, support and information activities of the Compliance function consist in:

- Advising Allfunds' Management and governing body on the measures required to ensure compliance with the law, rules, regulations and standards applicable. To do this, they should assess the possible impact of any change in the legal or regulatory environment concerning the Company's activities and the measures required for their implementation.
- Supporting training actions within the Company which have an impact on the business units concerning their scope.
- Advising and supporting the departments of the business and support areas concerning compliance issues.
- Leading or taking part in the definition of policies and procedures to comply with the applicable regulations and the internal codes of conduct. Likewise, providing support in the preparation of related procedures by the units of the first line of defence.
- Advising Allfunds' Human Resources Department and management body about the remuneration policy.
- Advising about any strategic decision related to a new business model or a new service or product.

⁶ According to the ESMA Guidelines on product governance (2 June 2017 | ESMA35-43-620), Allfunds is not a distributor with end-client investors nor is a producer of financial instruments. Therefore, it does not have the obligation to define the target market and distribution strategies of each of the funds it distributes. Consequently, the details of the products with regard to their target market are not included in the report to the Board of Directors.

- In the field of product governance, the Compliance function shall issue a documented opinion concerning any new product or service, any significant changes in existing products or services (related processes and systems), verifying compliance with the regulatory and supervisory framework in force or to be implemented and the consistency with the risk strategy and risk appetite of the Company.⁷
- Involvement in the outsourcing arrangements, including a prior documented assessment and ongoing monitoring⁸.
- Where necessary, providing advice on the relevant organisational changes and exceptional transactions of the Company due to the impact they may have on compliance risk.
- Taking part in any exchange of correspondence with the corresponding supervisory and regulatory authorities in their competence scope.
- Advising business areas about the design of top-tier controls.

5.4. Independence of the Compliance function

The Compliance area team does not have to carry out operational tasks it monitors and controls. It must be independent at an organisational level and its responsible or head cannot depend on a person who manages activities to be supervised by the team.

To carry out the above-mentioned duties, the Compliance area is established as an independent control function to effectively carry out its responsibilities. This independence shall be ensured in all regards, including a report line separated from the functions to be controlled. The area should have entirely full freedom to report irregularities or potential breaches and have unrestricted access to the Board of Directors and its committees.

People subject to the Compliance function shall then act independently. Therefore, the rest of the areas or departments cannot give instructions to compliance officers, nor influence otherwise on their staff and the activities they carry out. As a result, people in charge of developing the Compliance function cannot take part in the provision of the services and activities they control.

The remuneration of the compliance team cannot be linked to the results of the activities they supervise nor be defined in a way that their objectivity may be compromised.

⁷ In accordance with the EBA Guidelines on Internal governance EBA/GL/2021/05

⁸ In accordance with the EBA Guidelines on outsourcing arrangements EBA/GL/2019/02, and the Guidelines on Internal governance EBA/GL/2021/05

5.5. Adequate and sufficient resources

The Compliance function will have the necessary resources and knowledge, and the Head of Compliance shall be in charge of assessing the adequacy of the said resources and their scaling in case they are not sufficient. Employees of the Compliance function should have the professional qualifications, experience and preparation required to carry out their tasks, as well as receive regular training as may be necessary to keep the status required to develop their duties.

Likewise, the Compliance function shall have effective information systems for Allfunds' employees to be aware of the obligations, risks, and responsibilities resulting from their actions and know the regulations applicable to the duties they have been assigned.

5.6. Access to information and collaboration

To carry out their duties independently, the Compliance function may directly have access to the internal and external information they may require to comply with their responsibilities. It will have access to the necessary information regarding all of Allfunds' lines of business, in particular those that may arise significant risks for the company. In this regard, the Compliance function may be in contact with all employees and managers to ask for the collaboration of other functions within Allfunds.

The Compliance function would have the advice and assistance it may need to perform its duties. To this effect, it will have access to internal legal advice and may hire external advisers for the matters it may deem relevant.

Likewise, the Compliance function will keep the sensitive information to which it may have access as confidential information, following the legal requirements on the matter and its internal regulations, so that the information in question is only notified to the relevant levels and bodies of Allfunds.

6. Annual Compliance Plan

6.1. Compliance Monitoring Programme based on the risk assessment process

Allfunds has a Compliance Monitoring Programme according to its size and complexity which is reviewed on a regular basis according to the Compliance Risk Prevention Manual.

This compliance programme is based on the Company's matrix of regulatory risks in accordance with the activities carried out and the different jurisdictions where Allfunds operates (Risk Assessment matrix).

As a second line of control and defence, the objective of the programme is to monitor and verify the effectiveness of the internal policies and procedures defined to mitigate compliance risks, mainly the regulatory, reputational, conduct and criminal risks. It assesses whether Allfunds' activities are carried out according to the regulations in force and whether their policies, procedures, manuals, codes of conduct and, in general, control measures implemented to develop their activities within the organisation are still effective and adequate to prevent, detect, mitigate and minimise compliance risks and incidents that may result in sanctions, material or reputational losses.

To do this, the programme considers all the areas and services Allfunds offers to its clients, with a global and local approach. Likewise, the Compliance Monitoring Programme includes the Corporate Defence Model⁹.

The methodology applied is based on widely accepted criteria for risk assessment, considering the assessment of the inherent and residual risks of the different regulatory obligations. In Allfunds, the Compliance Monitoring Programme methodology is developed by its Compliance Risk Prevention Manual.

The implementation stages of the Compliance Monitoring Programme are as follows:

1. Risk assessment on the applicable regulation to Allfunds activities and risk assessment on the specific applicable requirements, at global and local level.

⁹ The controls of the Criminal Compliance Model are reviewed through the Group's Compliance Monitoring Programme of the Group, which is based on the assessment of regulatory risks, by including in the regulatory risk matrix the criminal risks that could take place in Allfunds as a result of the activities carried out, together with the controls identified that may mitigate them.

Moreover, analysis of the potential criminal risks that could impact the Company in the event of unlawful or improper behaviour by its staff.

2. Assessing the inherent risk to each regulatory obligation, depending on different parameters, such as: (i) regulations: the complexity of the regulations, the context of the monitoring, sanctions in case of non-compliance and assessment of the potential reputational damage; (ii) additionally, regarding the regulatory requirements in question, the impact on clients, the dependency on third parties and the complexity of the processes.
3. Allocation of mitigating controls and the control owner (1st line of defense in the business and support areas and location liable for such controls).
4. Execution of regular monitoring on the correct design and effectiveness of controls. First step through surveys to the business and support areas for self-assessing, and in second step the Compliance department reviews evidences and tests the controls.

The residual risk level of each requirement or regulatory obligation is determined based on the robustness/effectiveness of controls.

The assessment of all controls shall be duly documented. All controls are assessed at least once a year.

5. Defining action plans in case of identifying non-efficient or insufficient controls.
Taking the relevant and appropriate measures as a consequence of claims, complaints and incidents with clients.
6. Regularly reporting the risk indicators and the results of the monitoring process, as well as any deficiency or incidence detected, to Allfunds' Management, both at a global level through the Risk Committee and at a local level.

Likewise, regularly reporting risk indicators and the results and deficiencies detected to the Audit and Risk Committee of the Board of Directors.

Additionally, the annual compliance report submitted to the Board of Directors should include a detailed overview of the monitoring activities carried out through this programme, the results and deficiencies detected, and the action plans defined to remediate them.

The compliance function shall make sure the Compliance Monitoring Programme is always in line with the regulatory environment, the requirements of supervisors and the assessment of the risk profile. To do this, the function has a regulatory management methodology which facilitates the identification of emerging risks resulting from changes and new regulations, the new activities and the processes for internal, operational or technological reorganisation, among others.

The Compliance Monitoring Programme follows a dynamic model which may be adapted to incorporate new regulatory obligations or changes in the existing ones, organisational changes among the responsible Company's teams in charge of monitoring and improving processes, and new jurisdictions where Allfunds may expand its activities.

6.2. Training plan and policy review

As a complement to the Compliance Monitoring Programme, the function will develop an **annual training plan** to encourage regulatory knowledge, raising awareness regarding regulatory obligations and promoting a compliance culture and an ethical and responsible behaviour.

In addition, the Compliance function should regularly review the general policies and procedures in its area of activity, to ensure they are duly updated regarding to the regulations in force, and that they are in line with Allfunds' organisational structure and the activities carried out.

7. Monitoring and Updating

Allfunds shall monitor the development and regular review of this Regulatory Compliance Policy in order to identify any risk of non-compliance with this Policy and its regulatory obligations in this regard. For such purpose, this Policy is reviewed on a regular basis. However, should any deficiencies be identified, Allfunds will take all appropriate actions to mitigate them with due diligence

The Regulatory Compliance Unit is in charge of coordinating the regular review of this Policy, collaborating with the areas involved in its development and submitting it for approval to the Board of Directors.

The Regulatory Compliance Policy will be available to all employees on the Allfunds' intranet.