

Update May 2026

Zenus Bank Global Sanctions Compliance Program

Zenus Bank is committed to complying with all applicable economic and trade sanctions laws and regulations in the jurisdictions in which it operates.

In the United States, this includes sanctions administered and enforced by the U.S. Department of the Treasury's Office of Foreign Assets Control ("OFAC"), as well as other applicable U.S. sanctions laws and regulatory requirements. Zenus Bank also considers applicable international sanctions frameworks, including measures published or administered by the United Nations, the European Union, and the United Kingdom, where relevant.

Zenus Bank has established a Sanctions Compliance Program designed to promote compliance with applicable sanctions laws and regulations. The program includes, among other elements:

- Policies, procedures, systems, and internal controls reasonably designed to support sanctions compliance;
- Designated compliance personnel responsible for the implementation and oversight of sanctions controls;
- Risk-based screening of customers, transactions, and counterparties against applicable sanctions lists;
- Ongoing monitoring and escalation procedures for potential sanctions-related activity;
- Independent testing and review of sanctions compliance controls;
- Ongoing employee training related to sanctions compliance obligations;
- Recordkeeping and reporting procedures consistent with applicable legal and regulatory requirements.

Zenus Bank prohibits engaging in transactions involving sanctioned individuals, entities, jurisdictions, or prohibited activities under applicable law. The Bank maintains controls designed to detect and prevent prohibited transactions and to support compliance with evolving sanctions requirements.

Zenus Bank continuously reviews and enhances its sanctions compliance framework to address emerging risks and regulatory developments.

Sincerely,



Gabriel Viera

Zenus Bank