

O N E M A R K P R O P E R T I E S

# Compliance Package

*User Guide and Instructions*

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*Confidential Document — Internal Use*

## 1. Package Overview

This package brings together the compliance forms required for OneMark Properties to meet the legal obligations applicable to the sale of real estate assets, in particular those arising from Law no. 83/2017 of 18 August (combating money laundering and terrorist financing), Law no. 89/2017 of 21 August (Central Register of Beneficial Owners), the General Data Protection Regulation (GDPR) and related tax and regulatory legislation.

The package comprises six forms, in Portuguese and English versions, in editable Word (.docx) and PDF formats, totalling twenty-three files.

## 2. Package Contents

Reference	Title	PT	EN
OMP-KYC-PS / IN	KYC Individual / Pessoa Singular	✓	✓

Reference	Title	PT	EN
<b>OMP-KYC-PC / CO</b>	KYC Corporate / Pessoa Coletiva	✓	✓
<b>OMP-DOF / SOF</b>	Source of Funds Declaration / Origem de Fundos	✓	✓
<b>OMP-UBO</b>	UBO Declaration / Beneficiário Efetivo	✓	✓
<b>OMP-RGPD / GDPR</b>	GDPR Consent / Consentimento RGPD	✓	✓
<b>OMP-SOW</b>	Source of Wealth Statement (EN only)	—	✓

### 3. Adopted Parameters

The forms were designed on the basis of the following internal policy options, validated by the management of OneMark Properties:

- **Enhanced due diligence threshold:** transactions with a value equal to or greater than €500,000 (five hundred thousand euros) trigger the obligation to complete the Source of Funds Declaration and, in transactions with international buyers, the Source of Wealth Statement.
- **PEP policy:** transactions involving Politically Exposed Persons, close family members or closely associated persons are not subject to automatic refusal. They are instead escalated for specific review and approval by the Compliance Committee.
- **Languages:** all forms available in Portuguese and English, with equivalent legal terminology in both versions.
- **Formats:** editable Word (.docx) for internal use and assisted completion in meetings; PDF for direct sending to the client and for filing.

### 4. Application by Buyer Type

#### 4.1. Individual Buyer

- **Always:** OMP-KYC-PS-001 + OMP-RGPD-001
- **If value ≥ €500k:** add OMP-DOF-001
- **If international buyer:** use the EN versions; if value ≥ €500k, additionally consider OMP-SOW-001
- **If PEP / family member / associate:** refer to the Compliance Committee before the formal opening of the file

#### 4.2. Corporate Buyer

- **Always:** OMP-KYC-PC-001 + one OMP-UBO-001 for each beneficial owner + OMP-RGPD-001
- **If value ≥ €500k:** add OMP-DOF-001

- **If offshore entity or risk jurisdiction:** mandatory enhanced due diligence, with referral to the Compliance Committee
- **If any board member or UBO is a PEP:** referral to the Committee before the formal opening of the file

## 5. Recommended Workflow

To ensure operational consistency, the following form-processing flow is suggested:

- **Step 1 — Receipt of expression of interest:** sending of the PDF package to the prospective buyer (only the forms applicable to their profile).
- **Step 2 — Collection of completed forms:** receipt of the completed and signed forms, together with the supporting documents.
- **Step 3 — Document verification:** validation by the Compliance Officer or the designated person, with completion of the "Reserved for OneMark Properties" section.
- **Step 4 — Risk classification:** assignment of a risk level (Low, Medium, High, Enhanced) based on the defined criteria.
- **Step 5 — Approval:** decision by the competent person; in PEP or enhanced-risk cases, escalation to the Compliance Committee.
- **Step 6 — Filing:** retention for 7 years after the end of the business relationship (Article 51 of Law no. 83/2017).

## 6. Operational Recommendations

- **Final legal validation:** it is strongly recommended that the package be reviewed by CCA Legal (OneMark's legal adviser) before going into production, to ensure full alignment with the most recent practice of the CMVM, the Bank of Portugal and the CNPD.
- **Appointment of the Compliance Officer:** under Article 16 of Law no. 83/2017, a person responsible for regulatory compliance must be appointed, whose identity and contact details must be communicated to the competent authorities.
- **Compliance Committee:** formalise its composition (one executive member, the Compliance Officer and one independent member — possibly from the legal advisers — is suggested), as well as its rules of procedure.
- **Data Protection Officer (DPO):** create the dpo@themark-properties.com address referred to in the GDPR forms and appoint the person responsible for it.
- **Periodic review:** review the package annually, or whenever relevant changes occur in the applicable legislation.
- **Internal training:** deliver training sessions to the sales team on the application of the forms and on the warning signs to watch for.

## 7. Points Pending Internal Decision

The following points require a decision by management before the package goes into production:

- Nominal composition of the Compliance Committee and its rules of procedure;
- Appointment of the Compliance Officer and the DPO;
- Definition of the internal risk matrix by buyers' jurisdiction of origin;
- List of jurisdictions considered "high-risk" (aligned with the European Union list, the FATF list or another deemed appropriate);
- Policy on outsourcing document verification (possibly to specialised KYC firms, with technological integration).

*For any further clarification on the application of the forms, please contact the Compliance Officer of OneMark Properties.*