



<u>Procedure name</u>	<u>Proc. Written by</u>	<u>Last update</u>
Evaluation of Suitability according to R.D. 217/2008 ¹	Agustín Parra Compliance & FCP	December, 2022

0.- INTRODUCTION

Royal Decree 358/2015 complemented the existing regulatory development of Law 24/1988, of the Securities' Market, by creating new requisites and control measures for the Financial Institutions. This document implements the new regulatory frame referring to the suitability of the Members of the Board of Altura Markets, as well as of the Managing Direction

Altura's Direction is the responsibility of the Board of Directors and the Managing Director:

Members of the Board

Mr. José Antonio Ordás Porras (Chairman)
Mr. Amaury de Villemandy
Mr. Frank Borgel
Mr. Ramón Martínez Sobrado
Mr. Alexis Thompson
Mr. Alecandre Fleury

Altura's Managing Director (M.D.)

Mr. Sverre Hasvold

According to the Regulation, this evaluation will focus on three different areas:

- Commercial and Professional Integrity
- Skills and Experience
- Absence of impediments for the proper performance of their duties as Members of the Board, especially conflicts of interest and overlapping activities and responsibilities

1.- EVALUATION OF COMMERCIAL AND PERSONAL INTEGRITY (Art. 14 bis)

Altura has collected available data in order to evaluate three different aspects contemplated by the current Regulation:

a) A negative background based on regulatory or disciplinary issues.-

Considering the analogy with the task to be fulfilled, Altura has made use of the same tools available for the correct knowledge of its client base, this time focused on obtaining any relevant information about the members of the Board, as well as information previously provided to CNMV.

Details of the completed research are attached as Annex I, including:

- Result of search on World Compliance portal
- Result of enquiry performed with the KYC360 search engine
- Review of the Curriculum Vitae of Board members and the Managing Director

b) Having been found guilty of criminal offenses or having received administrative sanctions

¹ As amended by R.D.358/2015



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c) Currently being investigated following rational indicia of any infringement described on b)

2.- EVALUATION OF SKILLS AND EXPERIENCE (Art. 14 ter)

The professional capacities and experience of all the members of Altura's Board of Directors were already submitted to CNMV for its consideration, and were found to be accurate.

3.- ABSENCE OF IMPEDIMENTS AND CAPACITY TO PERFORM A GOOD GOVERNANCE (Art. 14 quater)

According to the previous experience of the Members of the Board and M.D, no objections are to be made regarding their capacity and suitability to fulfill their duties properly.

All of the individuals subject to this review are subject to Altura's Internal Code of Conduct. Acceptance of this Code involves a previous declaration of possible, known conflicts of interest, including directorship and/or senior management positions held by them. Up to date, none of these have been found as an obstacle for a good governance.

¹ As amended by R.D.358/2015