

Investor protection regulations
PRECONTRACTUAL INFORMATION

1. INTRODUCTION

Law 8/2013, of 9 May, on the organisational requirements and operating conditions of the entities operating in the financial system, investor protection, market abuse and financial guarantee agreements; Law 35/2022, of 24 November, amending Law 8/2013, and its implementing regulations, contain some of the provisions relating to investor protection laid down in the European Markets in Financial Instruments Directive (MiFID).

This legislation regulates the provision of investment or ancillary services and therefore directly affects all individuals and entities active in financial markets and covers a very broad public (from investment firms advising or selling financial products to clients or potential clients).

The above-mentioned directive, which inspires the Andorran legislation, aims to introduce a common regulatory system and to contribute to building a single market at European level in which financial services are provided homogeneously across countries. The main objective is to increase client protection vis-à-vis financial service providers by establishing rules of conduct that institutions are required to follow.

This document contains a brief presentation of the MoraBanc Group as well as information on the conditions and characteristics of the investment service/s and financial instrument/s affected by MiFID regulations, which Mora Banc Grup, SA (hereafter referred to as "MoraBanc") makes available to you, together with other pre-contractual information that you are entitled to know, in accordance with current regulations.

2. THE MORABANC GROUP

MoraBanc is a financial group with an international vocation that aims to meet the needs of its clients and satisfy their expectations, with an organisation orientated towards the creation of value and with a focus on quality as a competitive differentiating factor.

Founded in 1952, MoraBanc is a banking group whose capital is mainly family-owned and Andorran.

The MoraBanc Group is comprised of the following companies:

MORA BANC GRUP, SA

The group's banking entity. The head office is located in Andorra la Vella, with branch offices across the country to offer clients the best possible service.

Registered with the Company Registry under No. 1,828 and the Andorran Financial Authority (AFA) Registry under No. EB 06/95.

Address: Av. Meritxell, 96. AD500, Andorra la Vella | Principality of Andorra

Tel.: (+376) 884 884 | **Website:** www.morabanc.ad | **Email:** morabanc@morabanc.ad

MORA GESTIÓ D'ACTIUS, SAU

This company is responsible for the group's collective investment schemes management activity, operating under the brand name of MoraBanc Asset Management.

Registered with the Andorran Financial Authority (AFA) Registry under code EFI- OI 05/97.

Address: C/ de l'Aigüeta, 3. AD500, Andorra la Vella | Principality of Andorra

Tel.: (+376) 884 884 | **Email:** morabanc-am@morabanc.ad

MORA ASSEGURANCES, SAU

The object of this group entity is to provide all kinds of life insurance and reinsurance and for supplementary risks within the life branch.

Entity supervised by the Andorran Financial Authority (AFA).

Address: Plaça Coprínceps, 2. AD700, Escaldes-Engordany | Principality of Andorra

Tel.: (+376) 884 884 | **Website:** www.morabancassegurances.ad | **Email:** mora.assegurances@morabanc.ad

MORA WEALTH MANAGEMENT AV, SAU

A securities agency authorised to provide discretionary portfolio management services, financial advice and the reception and transmission of orders.

Registered with the CNMV under registration number 293.

Address: Av. Diagonal, Edifici Alta Diagonal, 640 1a planta, Local D-1, 08017 Barcelona | Spain

Tel.: (+93) 122 65 00 | **Website:** www.morawealth.es | **Email:** info@morawealth.es

BOREAL CAPITAL MANAGEMENT, AG

A wealth management firm based in Switzerland that also provides financial advisory services.

Member of the Swiss Association of Assets Managers (SAAM). Registered in the Companies Register under number CH-020.3.033.011.8.

Address: Talstrasse, 82. CH-8001, Zurich | Switzerland

Tel.: (+41) 44 256 8050 | **Fax:** (+41) 43 443 7732 | **Website:** www.borealcm.com | **Email:** info@borealcm.ch

BOREAL CAPITAL MANAGEMENT, LLC

A wealth management firm based in the USA that also provides financial advisory services.

Supervised and regulated by the Securities and Exchange Commission (SEC), with registration number 8-68910.

Address: 1450 Brickell Avenue, suite 2900. Miami, FL, 33131. Florida | United States of America

Tel.: (+305) 459 5400 | **Fax:** (+305) 459 5401 | **Website:** www.borealcm.com | **Email:** info@borealcm.com

BOREAL CAPITAL SECURITIES, LLC

Broker-dealer based in the USA.

Supervised and regulated by the Financial Industry Regulatory Authority (FINRA), with registration number 158599.

Address: 1450 Brickell Avenue, suite 2900. Miami, FL, 33131. Florida | United States of America

Tel.: (+305) 459 5400 | **Fax:** (+305) 459 5401 | **Website:** www.borealcm.com | **Email:** info@borealcm.com

Information on the supervisory body of the Principality of Andorra:

ANDORRAN FINANCIAL AUTHORITY (AFA)

Address: C/ Bonaventura Armengol, 10. Ed. Montclar, bloc 2, 4a planta.

AD500 Andorra la Vella (Principality of Andorra)

Tel.: (+376) 808 898, (+376) 865 977 | **Fax:** (+376) 865 977 | **Website:** www.afa.ad

3. INFORMATION ON THE GROUP BANKING ENTITY

MoraBanc works with the aim of being the best bank for its clients, the best company for its employees, of offering the best technological response to serve people as well as being a leading bank.

MoraBanc's mission highlights quality as a competitive differential factor, understood as the fact of satisfying our clients' expectations, both internal and external.

Aware of our responsibility to the environment as a company and of the need to strike a balance between competitiveness and sustainability in order to grow our business while making a positive contribution to society and the environment, we have signed up to a series of initiatives that guarantee quality and good business practices.

MoraBanc is made up of various business areas, whose aim is to cover the needs of clients, providing them with the most suitable services and products to meet their objectives and needs.

3.1. Communication methods and channels

- In person through the network of MoraBanc branches.
- By telephone via theTelebanc service (+376 884 884), for clients who have registered for the service.
- Through our website www.morabanc.com.
- By email: morabanc@morabanc.ad.
- By fax.
- Through MoraBanc Digital, for clients who have registered for the service.
- By post.

You can communicate with MoraBanc and receive communications and other information from us in Catalan.

3.2. Frequency of communications with the client

Each investment service has its own timeframes and methods of communication with clients, which are set out in the relevant contract.

3.3. Complaints and claims

Claims can be made:

- In person with a MoraBanc manager, who will complete the general details of the claim and deliver a signed acknowledgement of receipt to the client on request.
- Remotely by filling in the appropriate form on the website: www.morabanc.ad.

3.4. Services provided

MoraBanc is a global group that provides its clients with products and services tailored to each client profile. Within the framework of current regulations, and especially the provisions relating to investor protection, MoraBanc has established procedures and rules of conduct to ensure that it acts at all times with impartiality, professionalism and in the best interests of the client.

The services affected by these rules are as follows:

Investment services:

- Reception, transmission and execution of orders.
- Trading on own account when the bank acts as the client's counterparty in MoraBanc's own products.
- Discretionary and individualised portfolio management.
- Advice on investment services.

Ancillary services:

- Administration and custody of financial instruments.
- Foreign exchange, when related to the provision of investment services.

3.5. Client classification

Given that not all clients have the same degree of training and experience in investment, EU and Andorran regulations require clients to whom services are provided to be classified into established categories in order to adapt the protection measures for each investor according to their assigned classification.

- Eligible counterparty. National and international entities and bodies which, by their very nature, must act directly and regularly with the financial markets.
- Professional clients. This category relates to companies of a certain size and to natural persons who wish to be included in this category in accordance with legal requirements. They are granted a higher level of protection than eligible counterparties, although they are sufficiently familiar with financial instruments to take their own decisions.
- Retail clients. This refers to all other clients. They enjoy the maximum level of protection.

3.6. Changes of classification

Clients will have the right to request a change in the classification granted to them by MoraBanc, expressly in writing. Acceptance of the change will be subject to the prior assessment made by MoraBanc following the criteria of the regulations in force.

Additionally, in the specific case of a request for a change from retail client to professional client, this will entail an express waiver of the retail treatment and the associated level of protection.

MoraBanc will inform the client of the new classification assigned or its refusal.

3.7. List of instruments and financial products

3.7.1. Not affected by MiFID

- Current accounts, savings accounts, etc.
- Loans, credit policies, etc.
- Guarantees and documentary credits
- Pension plans
- Means of payment
- All insurance products

3.7.2. Affected by MiFID

Non-complex products

- Fixed-term deposits.
- Shares of companies listed on regulated markets.
- Money market instruments or bonds with no embedded derivative.
- Units or shares of Undertakings for Collective Investment in Transferable Securities (UCITS), except hedge funds, private equity, real estate funds and similar.

Complex products

- Money market instruments, bonds and other forms of securitised debt containing an embedded derivative. Preferred shares.
- Hedge funds and other non-traditional funds, such as private equity, real estate, commodities, etc.
- Derivatives on regulated or OTC markets (futures), options, swaps, warrants, caps, floors, etc.
- Structured products.

These products and their classification are listed for information purposes only.

3.7.3. Principal risks inherent to the financial instruments affected by MiFID

Any decision related to financial instruments involves a series of risks that should be known and assessed by the client before making any decision.

Risk is inherent to financial instruments and implies the possibility of not obtaining returns and, in the worst case, even the loss of the invested capital. The main risks are listed below:

- Price risk
- Exchange rate risk
- Credit risk or insolvency of the issuer
- Liquidity risk
- Leverage risk

Depending on the potential exposure of a financial instrument to a certain risk, or a combination of several risks, this financial instrument is said to have a risk level from very low to very high.

MoraBanc will provide you with sufficient information well in advance so that you can make your decisions with full knowledge of the inherent risks associated with the financial instrument you wish to purchase.

3.8. How is the product tailored to the client?

In order to tailor the investment products and services offered to the characteristics and particular situation of the client, the Law provides that certain information about the client must be collected by means of tests:

- In order to provide the service of reception, transmission and execution of orders, information must be obtained about your knowledge and experience in investments and securities markets, through the appropriateness test, and an assessment must be made. If this assessment is negative, MoraBanc will inform you that, in the opinion of the institution, the product you wish to contract is not suitable according to your characteristics. The legislation establishes that this service may be provided without the need to obtain information or assess the client's knowledge and experience, provided that certain specific conditions are met.
- In order to provide the discretionary portfolio management service in accordance with the mandate granted by the client, we must assess whether you agree to investment decisions being delegated to a third party and are aware of the implications of contracting this service, as well as obtaining data about your investment objectives and liquidity needs for these contracts, by means of the suitability test for discretionary management, in order to be able to determine the most appropriate management model. If this information is not obtained, MoraBanc will not provide the requested service.
- In order to provide the investment advisory service, information regarding your knowledge and experience in investments and securities markets, your investment objectives and your need for liquidity (suitability test) must be obtained in order to determine the suitability of the product or portfolio. If this information is not obtained, MoraBanc will not provide the requested service. If the product or portfolio is considered unsuitable, Mora Banc will inform you that, in the opinion of the institution, the product or portfolio you wish to purchase is not suitable according to your characteristics.

3.9. Client information

The content of the pre-contractual, contractual and post-contractual information made available to the client is defined below.

- **Pre-contractual information:** through the commercial information made available to the client, including this communication, as well as information on the characteristics and risks of the products.
- **Contractual documentation:** through the signing of a framework contract, as well as in the purchase of each of the specific investment products or services that the client may purchase.
- **Post-contractual information:** through the inclusion of communications that are available to the client, within the framework of the provision of investment services and the information requirements established by law.

3.10. Order management and execution policy

MoraBanc has established an order management and execution policy that involves adopting reasonable measures to obtain the best possible return in its clients' transactions, taking into account a series of factors that are detailed in the policy itself.

For all purposes, the financial instruments on which the Bank may provide the services of reception and transmission of orders and, where appropriate, execution of orders on behalf of its clients, are as follows: equities, money market instruments, investment funds and derivatives listed on organised or OTC markets, fixed-income securities and structured products.

A full copy of the order management and execution policy can be obtained from the MoraBanc branch network or via the website www.morabanc.ad, under the "Legal Information" section.

3.11. Asset protection policy

The aim of the policy is to protect the ownership rights to the client's financial instruments in the event of the alleged insolvency of the entity and to prevent the use of these financial instruments for its own account.

A full copy of the asset protection policy can be obtained from the MoraBanc branch network or via the website www.morabanc.ad, under the "Legal Information" section.

3.12. Conflict of interest management policy

Andorran legislation establishes that entities operating within the financial system must adopt the appropriate organisational and administrative measures to detect and avoid conflicts of interest, and have identified the circumstances that generate conflicts of interest, which are defined as those situations in which there is a conflict between the interests of the MoraBanc Group and those of its subsidiaries or certain persons linked to MoraBanc.

The objectives of MoraBanc's general conflict of interest policy are listed below:

- i) The identification of those situations that could potentially generate a conflict of interest management policy (between the MoraBanc group and one of its clients, between the MoraBanc group and its employees, between employees and clients, and between different clients).
- ii) The specification of the procedures to be followed and the measures to be adopted to prevent, manage and disclose the conflict, if applicable.

It should be noted that the obligation relating to the management of conflicts of interest does not prohibit their existence, but rather requires the adoption of reasonable measures for their prevention and resolution, identifying, in the same manner, a process of communication to clients in cases where conflicts of interest cannot be avoided.

The MoraBanc Group has the following measures in place to prevent and, in any case, efficiently manage potential conflicts of interest:

- Restricted access to information through personal passwords.
- Monitoring of personal transactions, as set out in the codes of conduct.
- Control of privileged information to prevent, avoid and, if applicable, manage any conflicts of interest that may arise in the processing of privileged information, even taking into account the physical separation of the different areas (separated areas) in which possible conflicts of interest have been identified.
- Management, in the Corporate Integrity Management Committee (CGIC), of potential breaches.
- Annual updating of the register identifying potential conflicts of interest.

A full copy of the general policy on conflicts of interest can be obtained from the MoraBanc branch network or via the website www.morabanc.ad, under the "Legal Information" section.

3.13. Information on charges and costs

MoraBanc will receive, for the provision of investment and/or ancillary services related to the financial instruments affected from time to time by MiFID, the fees established in its Fee Book.

In the case of investment funds, the information on charges and costs is included in their prospectuses. The fees given are maximums.

You can obtain a full copy of the conditions, fees and expenses chargeable to clients from the MoraBanc branch network or through the website www.morabanc.ad, under the "Charges and conditions" section.

3.14. Information about the Andorran Deposit Guarantee Fund (FAGADI) and the Andorran Investment Guarantee Scheme (SAGI)

Basic information on deposit protection

Law 20/2018, of 13 September, regulating the Andorran Deposit Guarantee Fund and the Andorran Investment Guarantee Scheme obliges banking institutions to provide actual or potential depositors with the information necessary to identify the Andorran Deposit Guarantee Fund (FAGADI). This information includes in any case its name, headquarters, telephone number, Internet and email address, as well as the provisions that apply, specifying the amount and scope of the guarantees offered, and the conditions and formalities necessary for payment of the guaranteed amount.

Deposits with Mora Banc Grup, SA are protected by:	Andorran Deposit Guarantee Fund (FAGADI)
Protection limit:	100,000 euros per depositor and per banking entity ⁽¹⁾
If you have more deposits with the same bank:	All your deposits with the same bank are added together and the total is subject to the limit of 100,000 euros ⁽¹⁾
If you have a joint account with other persons:	The limit of 100,000 euros applies to each depositor separately ⁽²⁾
If you have debts in the same bank:	<p>Debts owed by the depositor to the bank are not considered when calculating the repayable amount, unless the due date of such debts is prior to or equal to the reference dates for calculating the repayable amount provided for in current legislation, and the legal and contractual provisions governing the contract between the banking institution and the depositor so provide.</p> <p>In any case, banking institutions shall duly inform depositors, before signing the contract, of the circumstances in which their debts to the bank will be taken into account or not in calculating the amount guaranteed in accordance with the provisions of the previous paragraph.</p>
Repayment period in the event of insolvency of the bank:	20 working days ⁽³⁾
Currency in which repayment is made:	Euro
Contact:	<p>C/ Bonaventura Armengol, 10 Edifici Montclar, bloc 2, planta 4a planta AD500 Andorra la Vella Principality of Andorra Tel.: (+376) 808 898 Email: fagadi@afa.ad</p>
Further information:	www.afa.ad/fagadi

Further information

⁽¹⁾ If a deposit is unavailable because a bank is unable to meet its financial obligations, FAGADI must reimburse depositors. The reimbursement will be for a maximum of 100,000 euros per depositor and per bank. This means that all the deposits held with the same bank are added together to determine the level of coverage, always up to the maximum limit of FAGADI's overall coverage as established in Article 20.1 of Law 20/2018, of 13 September, regulating the Andorran Deposit Guarantee Fund and the Andorran Investment Guarantee Scheme. If, for example, a depositor holds a savings account with 90,000 euros and a current account with 20,000 euros, only 100,000 euros will be reimbursed.

(2) In the case of joint accounts, the limit of 100,000 euros applies to each depositor.

In certain cases provided for in Article 8(2) of Law 20/2018, of 13 September, regulating the Andorran Deposit Guarantee Fund and the Andorran Investment Guarantee Scheme, deposits are guaranteed above 100,000 euros. More information is available at www.afa.ad/fagadi.

⁽³⁾ The responsible deposit guarantee scheme is the Andorran Deposit Guarantee Fund (FAGADI), which will reimburse your deposits (up to a maximum of 100,000 euros) within the following deadlines:

- a) Twenty working days, until 31 December 2018;
- b) Fifteen working days, between 1 January 2019 and 31 December 2020;
- c) Ten working days, between 1 January 2021 and 31 December 2023;
- d) Seven working days, from 1 January 2024.

Until 31 December 2023, where FAGADI is unable to repay the repayable amount within seven working days, it will pay depositors, no later than five working days after their request, an appropriate amount from their guaranteed deposits so as to cover their basic needs. This amount will be deducted from the repayable amount of the deposits.

FAGADI grants access to the suitable amount referred to in the previous paragraph only on the basis of its own data or the data provided by the member institution.

This payment may be deferred in any of the cases provided for in Article 10 of Law 20/2018, of 13 September, regulating the Andorran Deposit Guarantee Fund and the Andorran Investment Guarantee Scheme.

If your deposit has not been refunded within this period, you should contact FAGADI, as the time during which the refund can be claimed may be limited. For more information, visit www.afa.ad/fagadi.

Other important information

In general, all retail and corporate depositors are covered by FAGADI. Exceptions applicable to certain deposits can be consulted on the FAGADI website. Your bank will also inform you, upon request, whether certain products are covered or not. If deposits are covered, your bank will also confirm this on your account statements.

Basic information on investment protection

Law 20/2018, of 13 September, regulating the Andorran Deposit Guarantee Fund and the Andorran Investment Guarantee Scheme, obliges banking institutions to make available to real or potential investors the information necessary to identify the Andorran Investment Guarantee Scheme (SAGI). This information includes in any case its name, headquarters, telephone number, Internet and email address, as well as the provisions that apply, specifying the amount and scope of the guarantees offered, and the conditions and formalities necessary for the payment of the guaranteed amount.

Investments with both Mora Banc Grup, SA and Mora Banc, SAU are protected by:	Andorran Investment Guarantee Scheme (SAGI)
Protection limit:	100,000 euros per investor and per banking or financial investment institution ⁽¹⁾
If you hold more investments with the same institution:	All your investments with the same institution are added together and the total is subject to the limit of 100,000 euros ⁽¹⁾
If you hold an investment jointly with other persons:	The limit of 100,000 euros applies to each investor separately ⁽²⁾
Reimbursement period in the event of insolvency of the institution:	3 months ⁽³⁾
Currency in which repayment is made:	Euro
Contact:	C/ Bonaventura Armengol, 10 Edifici Montclar, bloc 2, 4a planta AD500 Andorra la Vella Principality of Andorra Tel.: (+376) 808 898 Email: sagi@afa.ad
Further information:	www.afa.ad/sagi

Further information

⁽¹⁾ If investments are unavailable because an institution is unable to meet its financial obligations, SAGI must reimburse the investment holders. The reimbursement will be for a maximum of 100,000 euros per institution. This means that all investments deposited, managed or held in custody with the same institution are added together to determine the level of coverage, always up to the maximum limit of SAGI's overall coverage as established in Article 20.2 of Law 20/2018, of 13 September, regulating the Andorran Deposit Guarantee Fund and the Andorran Investment Guarantee Scheme. If, for example, an investor holds 90,000 euros worth of shares in deposit or custody and 20,000 euros worth of government bonds in deposit or custody, only 100,000 euros will be reimbursed.

⁽²⁾ In the case of joint ownership of investments, the limit of 100,000 euros applies to each investor.

⁽³⁾ The responsible guarantee scheme is the Andorran Investment Guarantee Scheme (SAGI). It will reimburse your investments (up to a maximum of 100,000 euros) no later than three months after having determined the suitability and the amount of the investor's position.

If you have not been reimbursed within this period, you should contact SAGI, as the time during which you can claim reimbursement may be limited. For more information, visit www.afa.ad/sagi.

Other important information

In general, all retail investors and businesses are covered by SAGI. Exceptions applicable to certain investments are available on the SAGI website. Your institution will also inform you, upon request, whether certain products are covered or not. If the investments are covered, the institution will also confirm this on the account statements.

3.15. Order execution centres

EXECUTION CENTRES FOR EQUITIES

Country	Market
Germany	Xetra, Frankfurt, Berlin, Hamburg, Düsseldorf
Australia	Sydney
Austria	Vienna
Belgium	Brussels
Canada	Toronto, Montreal, Vancouver
Denmark	Copenhagen
Spain	Mercado Continuo, Madrid, Barcelona, Valencia, MARF, MAB, LATIBEX
United States	Amex, Nyse Nasdaq, Arca
Finland	Helsinki
France	Paris, Nouveau Marché
Greece	Athens
Hungary	Budapest
Ireland	Dublin
Italy	Milan
Japan	Tokyo, Osaka, Jasdaq
Norway	Oslo
Poland	Warsaw
Portugal	Lisbon
United Kingdom	London
Sweden	Stockholm
Czech Republic	Prague
Singapore	Singapore
South Africa	Johannesburg
Switzerland	Vix
China	Hong Kong

SUMMARY OF INSTRUMENTS, INTERMEDIARIES* AND EXECUTION CENTRES

Type of asset	Type of market	Broker	Execution centre
Equities	Organised market	Instinet Stiffel KBC Oddo Securities Nomura Mirabaud JB Capital JP Morgan Kepler Morgan Stanley Banc de Sabadell Société Générale Ahorro Corporación Beka Santander Flow Traders Intermoney Inversis StoneX Bestinver	International stock exchanges
Fixed-income securities	OTC Market	MoraBanc own portfolio	MoraBanc own portfolio
Mora Asset Management investment fund	OTC Market		Mora Gestió d'Actius SAU
Investment fund from other Other fund managers	OTC Market	All funds International, Quintet Bank MFEX	Authorized international fund managers
Derivatives	Organised markets	Altura Markets	International stock exchanges
	OTC Market	MoraBanc own portfolio	MoraBanc own portfolio
Structured Products	OTC Market	MoraBanc own portfolio	MoraBanc own portfolio

*This includes the principals

3.16. General considerations

MoraBanc has designed training programmes for all its professionals and has adapted its processes to ensure compliance with current regulations.



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