

LONDON AND CAPITAL EUROPE ORGANISATIONAL SUMMARY

BOARD OF DIRECTORS

Senior management are required to ensure that LONDON AND CAPITAL WEALTH MANAGEMENT EUROPE, A.V. S.A. (hereinafter, "LCE") applies robust governance arrangements, which include a clear organisational structure with well defined, transparent and consistent lines of responsibility. As well as effective processes to identify, manage, monitor and report the risks they are or might be exposed to, and internal control mechanisms, including sound administrative and accounting procedures, effective control and safeguard arrangements for information processing systems.

THE BOARD OF DIRECTORS OF LCE

Chairman: Guy McGlashan

Vice Chairman: Pau Morilla-Giner (L&C Chief Executive Officer)

Dominic Crabb (L&C Chief Compliance Officer)

COMPANY SECRETARY

Maria Gracia Rubio de Casas

LEGAL ADVICE & GDPR

Thomas Donlon

OPERATIONS

Executive Director: Macarena Sanmartín

INVESTMENT ADVISERS

Pau Morilla Giner

Diego Pájaro

INTERNAL AUDIT FUNCTION

The Internal Audit function assists the Board of Directors in its responsibility for the assessment and development of appropriate internal control systems for LCE. The Board of Directors of LCE has delegated the internal audit function to Informa Consulting Compliance, S.L.

The Internal Audit Function develops and applies the Internal Audit yearly plan that is approved by its Board of Directors, this includes a review of the internal control systems and procedures according to the firm's risks and regulatory compliance requirements, evaluating their efficiency and effectiveness, by carrying out substantive tests on existing procedures and controls. The Internal Audit function makes relevant recommendations and subsequently corroborate compliance and effectiveness.

Two semi-annual reports are prepared throughout the year and submitted to the Board of Directors. The annual report is submitted to the National Securities Market Commission (CNMV).

COMPLIANCE & RISK MANAGEMENT

LCE has established a unique unit responsible for the Compliance and Risk functions (Norm 4th paragraph 1, of the Circular 1/2014) and has therefore issued the current joint report (Norm 5th paragraph 3.6 and Norm 6th paragraph 3.9.4. of the Circular 1/2014).

The Compliance and Risk Management functions act independently and perform the functions of regulatory compliance and risk control.

The Compliance and Risk Management functions of LCE are undertaken by Carmen Artigas residing in Spain, with the support of the internal Compliance team in London. Dominic Crabb, a member of LCE's Board and Chief Compliance Officer of London and Capital Group, oversees the Compliance and Risk Management function.

A compliance monitoring plan has been established and will be reviewed on an ongoing basis and at least annually, as well as in accordance with changes in regulation or circumstances arise.

The Risk Management function is carried out with the assistance of Bryony Skinner based in the London Compliance team, monitoring the adequacy and effectiveness of LCE firm's risk management policies and procedures. The Risk Management function reports quarterly to the Board of Directors.

Both the Compliance and the Risk Management function report quarterly to the Board of Directors.

CUSTOMER CARE FUNCTION

The purpose of this function is to handle and resolve complaints and claims presented by its customers. LCE has approved and makes available at its webpage the Customer Care Code.

The Board of Directors of LCE has appointed Guy McGlashan, a member of the Board, as Head of the Customer Care function.

ORGANISATIONAL STRUCTURE

LCE has an organization according to the needs required to carry out the activity for which it is authorized.