

**Anti-Money Laundry Policy**  
**("Housers Money Laundering Policy")**

**Housers – Commitment to the fight against money laundering  
and terrorism financing**

The fight against money laundering and the financing of terrorism is one of the priorities of modern societies to prevent the international spread of criminal and illicit activities. Housers Global Properties PFP S.L. (hereinafter "Housers") assumes the challenge of collaborating with the various competent administration, financial institutions and payment entities and civil society in general, in the fight against money laundering practices and the financing of terrorism through a greater and more adequate detection and prevention of these situations.

**The services of Lemon Way, as a payment services entity and the internal procedures of Housers.**

Housers has outsourced to the payment services entity Lemon Way all the payments and movements of funds that are made through the platform. This payment entity has the obligation to fight against tax evasion, money laundering and the financing of terrorism, all regulated in the Law of the Monetary and Financial Code. Housers' Compliance department has the firm intention to require the payment entity to comply with its obligations in terms of BCFT.

Additionally, Housers has implemented certain procedures and internal control mechanisms aimed at preventing money laundering and terrorist financing. All transaction can be monitored and audited both by Housers and by the competent authorities, using Housers' information systems or those of its payment service provider. Housers reserves the right to admit new users, whether natural or legal persons. Only investors or developers who present valid personal and fiscal identification documents, and who provide correct information to



Housers and the associated payment entity, can register and participate. The objective of this procedure is to ensure that all Housers investors or developers are subject to proper controls by the partner payment entity.

In addition, the payment institution has undertaken to carry out periodic examinations of users as part of the ongoing monitoring of clients, about the identification of high-risk clients. The result of these examinations carried out should be kept on file.

If a situation of suspicious is identifies, the payment institution must inform Housers' Compliance Department, which will have 48 hours to analyze the situation and collect, if necessary, additional information from the Client. After this analysis, the Compliance Department must define, in a completely independent manner, on possible procedures or communications to be executed, in addition to informing the members of the Board of Directors in writing of the measures taken.

In case of indications and suspicions of MLFT practices or attempts, the Housers Management must proceed to the immediate communication of the same to the competent authorities. It must suspend or limit the user's registration or activities on the platform if this does not prejudice an eventual investigation or action by the competent authorities.

Housers has established within its registration procedures for users and developers the following controls to prevent access to high-risk users:

- Users may only change their personal data by written communication and must provide the necessary supporting documentation for such change.
- Users who submit identical personal or registration data will not be able to complete the registration process.
- Users who submit false or erroneous supporting documentation will not be allowed to register.
- Users who refuse to provide the necessary clarifications regarding identification may not be registered.



- **Registration information**

Housers will ensure, for each financing, the registration of the following element of information:

- a) Complete identification of the investors and developers.
- b) The amounts invested, individualized by investors and by operations.
- c) Dates of realization of the investments, including dates of total or partial amortization.
- d) Full identification of the persons redeeming all or part of the amounts invested, in so far as such redemption is not carried out by the beneficiary.
- e) Value of the remunerations received or of the shares in the capital or dividends and shared benefits, individualized by investors.

Housers, within its procedures, contemplates the access to this type of information in an agile way, being the same available to the different regulatory bodies.

- **Supervision by the Compliance Department**

The Compliance department is the body in charge of periodically supervising compliance with the money laundering policy.

- **Record keeping**

Housers has acquired the commitment to conserve, in a durable medium, the aforementioned data, as well as the demonstrative support of the same, for a period of 10 years.

