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In case of legal matters the original documents written in Portuguese, and other Portuguese legislation should be consulted.

INTERBOLSA CIRCULAR no. 1/2019 – Open end investment funds: subscription and redemption operations

In compliance with the dispositions established in Articles 89 and 269 of the Securities Code, as well as in Article 33 of INTERBOLSA Regulation no. 2/2016, concerning the general operational rules of the Centralised Securities Systems and of the Securities Settlement Systems, the Managing Board of INTERBOLSA – Sociedade Gestora de Sistemas de Liquidação e de Sistemas Centralizados de Valores Mobiliários, S.A. (INTERBOLSA) approved the present Circular:

1. The present Circular establishes the procedures to be applied to the automatic processing of subscription and redemption operations of units of open end investment funds as well as other similar instruments.

2. INTERBOLSA has made available, for the purpose of subscription and redemption settlement operations, a registration and order routing service which allows the financial intermediaries to send, in real time, their clients' orders to the entity responsible for their acceptance and execution, i.e., the managing entity of the investment fund or the custodian entity (herein referred to as Responsible Entity).

3. The subscription and redemption orders must be registered in the System by the financial intermediaries recording the quantity of fund units or the respective amount to subscribe or redeem, the systems thereof immediately carries forth their validation, particularly in what concerns their form and content, as follows:

a) Whenever the subscription or redemption order of fund units is registered indicating the quantity of securities to subscribe and redeem, respectively, the System immediately proceeds to the validation of the decimal places recorded in the order, using for this purpose the decimal places identified for the issue in question, rejecting the order in case both are not in conformity;

b) For the redemption orders registered with the quantity to redeem, the System verifies the existence of balance/provision in the account and immediately blocks the securities in question; in the event there are not enough securities to meet the order, the latter is therefore rejected;

c) If the redemption order is registered with the respective amount to redeem, the System blocks/holds the securities in the respective account only after the confirmation is taken place by the Responsible Entity, with reference to the quantity to redeem;

d) Following validation, the System immediately informs the financial intermediaries involved regarding the accepted and rejected orders.

4. Once the above mentioned validation takes place, the accepted orders are numbered and registered in the System, the confirmation of the registration of the request is sent, in real time, to the financial intermediary, and the respective information is immediately sent to the Responsible Entity.

5. The Responsible Entity, after having verified and validated the mentioned order, accepts or rejects the orders that have been transmitted, informing the System of such fact, and when necessary, giving information regarding its previous settlement, in turn, the system subsequently informs the financial intermediary in question.

6. The Responsible Entity may change the settlement date as well as the amount to be settled, as follows:

a) If the Responsible Entity carries forth changes to the settlement date or the amount previously indicated in the order, the financial intermediary receives, in the confirmation message, the corresponding information on the change (s) made;

b) If the order is carried out with the indication of the amount, the Responsible Entity may only accept or refuse it, and cannot alter this field.

7. Whenever an order is rejected by the Responsible Entity, the System informs the financial intermediary of such fact, and in the event of a redemption order, the securities are immediately released.

8. The following procedures are applicable to the cancellation of subscription and redemption orders registered in the System:

a) The cancellation instruction is registered in the System by the financial intermediary in question with the identification number of the subscription or redemption order to be cancelled;

b) The System validates the order as to its existence, form and content and immediately forwards the cancellation information to the Responsible Entity;

c) The Responsible Entity accepts or rejects the cancellation instruction informing INTERBOLSA of the fact, who, in turn, will inform the financial intermediary involved in the operation:

c1) Whenever the cancellation request for an order is sent on the day prior to the settlement before the time defined by the managing entity or by the custodian entity (cut-off time), the Responsible Entity can accept the request on the same day, and the financial intermediary is informed of the event;

c2) Whenever the cancellation request for an order is sent on the day prior to the settlement after the cut-off time, the request is therefore rejected by the System and the financial intermediary is informed of the event;

c3) Whenever a redemption order is cancelled, the System then immediately releases the securities in question;

d) If at any moment the financial intermediary wishes to change a subscription or redemption order already registered in the System, the financial intermediary shall follow the cancellation procedures according to the dispositions of the above mentioned paragraphs and carry out the registration of a new order, according to the procedures set forth in the present Circular.

9. The settlement of subscription and redemption orders, registered in the System, is carried out following the procedures below:

a) At the time fixed in INTERBOLSA notice, the necessary instructions to the settlement of the order are sent to TARGET2-Securities (T2S), as well as the update of the static data.

b) There is no partial settlement;

c) There is no securities failure, once the securities are created or blocked, respectively, in subscription and redemption orders:

c1) At the time of the settlement, in the case of subscription orders;

c2) At the time of the acceptance/confirmation of the order, in the case of redemption orders.

d) In case of financial failure, the payment instruction will be maintained in T2S until its settlement or cancellation.

10. The order routing system's working hours are set forth in INTERBOLSA's notice regarding the operating hours of the systems (schedules).

- 11.** The present Circular revokes INTERBOLSA Circular 1/2017, related to open end investment funds: subscription and redemption operations.
- 12.** The present Circular comes into force on 7 August 2019.

INTERBOLSA
The Managing Board