PALANCA BRIDGE CORP · COMPLIANCE FIRST

Compliance Program

The controls that govern which work we accept and how we carry it out

— What this program is

Palanca Bridge is a U.S. advisory firm. It is not a bank, a regulated financial institution, a law firm, a law-enforcement body, or a certification authority. The controls below govern which work we accept and how we carry it out.

— Engagement acceptance and client screening

Every prospective client is screened before any engagement letter is issued: identity, ownership, sanctions, and conflicts. Work starts only after the engagement letter is signed.

— Red flags and escalation

Defined red flags, including state-owned-enterprise or public-procurement nexus combined with politically exposed persons, escalate to the Chief Compliance Officer for enhanced review. Legal questions are referred to licensed counsel.

— Decline and walk-away authority

The Chief Compliance Officer, Tom Kayo, decides which engagements the firm accepts and can decline or stop any engagement on compliance grounds. A sanctions hit at screening results in a decline unless the match is shown to be false or the work is shown to be lawful. Declinations above defined thresholds receive a second review by the Director of European Markets.

— Verification standard

We work from public and lawfully obtained sources in Portuguese and English. Ownership is traced to individuals where records allow; where it cannot be traced, the limitation is stated or the matter is declined. Every source is logged with its date of access.

— Sanctions and re-screening

Parties are screened against U.S. (OFAC), EU, and UN sanctions lists and for political exposure at intake and before delivery, and re-screened at least every 30 days during an engagement.

— Anti-bribery

We do not pay, offer, or facilitate anything of value to obtain business or influence a decision. Advisory fees only: no commissions, success fees, finder's fees, or fees contingent on a transaction, financing, or award.

— Conflicts and independence

Every intake is checked against a conflicts register. We serve one side per procurement.

— Review and sign-off

Every deliverable is reviewed before issue. Each Compliance Screening Letter is signed by the Chief Compliance Officer and countersigned by the Director of European Markets after a documented quality review.

— Records

Engagement records are retained encrypted for at least seven years under a written records-retention policy.

— Insurance

Professional liability (errors and omissions), cyber liability, and commercial general liability insurance. Certificates on request.

— Markets we do not serve

Published at palancabridge.com/markets/excluded and updated when sanctions or governance conditions change.

— Contact

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