

Relevant Information Document

ATLÁNTIDA01

**Public Offering of Debt Securities
BANCO ATLÁNTIDA EL SALVADOR S.A.**

Digital Asset Service Provider:

BANCO ATLÁNTIDA EL SALVADOR, S.A. (PSAD-0035)

Issuer:

BANCO ATLÁNTIDA EL SALVADOR, S.A.

Date: July 2026



1. SUMMARY

BANCO ATLÁNTIDA EL SALVADOR, S.A. (the “Issuer”), with issuer registration number EAD-0053, a member of **Inversiones Financieras Atlántida, S.A.**, a subsidiary of **Inversiones Atlántida, S.A. (INVATLAN)**, the holding company of the **Atlántida Financial Group of Honduras**—a conglomerate with over 100 years of experience and a regional presence in Central America and Belize—presents this Material Information Document (DIR) to provide investors and the general public with a clear and detailed description of the token issuance:

– ATLÁNTIDA01 (Debt Token)

The ATLÁNTIDA01 Public Debt Offering is structured as a tokenized debt program in tranches, up to USD \$300,000,000.00, which incorporates direct payment obligations borne by the Bank in accordance with the specific terms of each tranche. The purpose of the program is to offer investors the opportunity to participate, through debt tokens, in the financing of active operations, as well as in funding matching, liquidity management, or other permitted banking purposes, taking into account criteria of sustainability, economic development, and potential social impact.

The issuance program will be non-revolving; consequently, payments, amortizations, redemptions, or maturities of the issued tokens will neither restore nor increase the maximum authorized amount or the availability of the program.

Each ATLÁNTIDA01 token represents a credit claim against the Issuer, based on the stake acquired in the corresponding tranche, without conferring any equity, voting, corporate, or ownership rights over the Bank’s assets, nor any management rights over the Bank.

This issuance of debt tokens is part of BANCO ATLÁNTIDA EL SALVADOR, S.A.’s strategy aimed at diversifying and optimizing its funding sources through the incorporation of structures based on distributed ledger technologies. Through this mechanism, investors will be able to acquire debt tokens that confer credit rights against the Issuer, linked to their participation in the program’s various tranches. The funds raised will be used to finance lending operations, as well as for structural funding matching, liquidity management, and other permitted banking purposes, all in the ordinary course of business and in accordance with the applicable terms, conditions, and regulatory framework.

A. Key Aspects of the Business:

- **Origination of Lending Operations:** The bank originates and places credit transactions in accordance with its customers’ needs, structured under flexible and efficient financial arrangements, with the aim of promoting financial intermediation and the sustainable generation of value.
- **Revenue Generation:** The revenue allocated to the token’s repayment will come from the bank’s financial operations and ordinary activities, including interest, fees, and other

charges associated with the products and services offered to its customers, enabling the maintenance of recurring, stable, and sustainable cash flows over time.

- **Funding Through Digital Assets:** The funding of the Bank's lending operations, as well as funding matching, liquidity management, and other permitted banking purposes, will be carried out through the issuance and placement of debt tokens. This mechanism is designed to help raise funds under efficient terms, diversify funding sources, and strengthen the management of the institution's capital and liquidity structure.
- **Financial Innovation:** The use of digital assets and *blockchain* technology in the Bank's funding and operations incorporates mechanisms that enhance the transparency and traceability of transactions, as well as strengthen confidence in financial processes, in line with evolving technological and market trends.

B. Strategic Objectives of the Issuance

- **To finance the company's operations:** To raise capital to support and finance active operations and to address funding, liquidity, or other permitted banking purposes of the bank, enabling the offering and management of credit products in accordance with its customers' needs, while simultaneously strengthening the institution's funding and liquidity structure.
- **Expand access to financial services:** Facilitate financial inclusion through a diversified range of products tailored to different customer segments and market needs.
- **Optimize costs and operational efficiency:** Reduce reliance on traditional intermediaries, lowering transaction costs and simplifying access to investment opportunities.
- **Promote transparency and security in the investment process:** Leverage the advantages of *blockchain* technology to ensure an immutable and reliable record of transactions.

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C. Issuance Structure

I. Debt Token (ATLÁNTIDA01)

- The ATLÁNTIDA01 debt tokens will be legally backed by a Framework Agreement for the Acknowledgment of Debt, through which the Issuer will document and acknowledge the obligation to pay principal, interest, amortizations, redemptions, or reimbursements arising from the issuance in favor of the token holders.
- All tranches of the issuance will be identified under the general designation ATLÁNTIDA01. Notwithstanding the foregoing, each tranche will have a specific and consecutive " " identifier, in accordance with its placement order, using the designation ATLÁNTIDA01 – Tranche 1, ATLÁNTIDA01 – Tranche 2, ATLÁNTIDA01 – Tranche 3, and so on.
- Payment of principal and interest will be made in accordance with the financial terms established for each tranche, including the applicable payment frequency, which may be monthly, semiannual, annual, at maturity, or as otherwise defined in the terms and

conditions of the issuance, placement announcements, and this Material Information Document.

- The Master Debt Acknowledgment Agreement does not constitute a specific guarantee in favor of investors, but rather serves as the legal instrument through which the underlying credit obligation owed to the Issuer is formalized, documented, and made enforceable. Consequently, although the issuance does not have any security interests or specific guarantees, the payment obligation is recognized and contractually backed by said instrument.

II. Purpose of the Debt Token Offering (ATLÁNTIDA01)

The funds obtained from the sale of the Debt Token Offering (ATLÁNTIDA01) will be used to support and finance active operations and to meet funding, liquidity, or other permitted banking purposes of BANCO ATLÁNTIDA EL SALVADOR, S.A., in accordance with its growth strategy and risk profile.

Specifically, the funds will be directed toward:

- **Loan origination and placement:** Financing the bank's lending operations, meeting customer demand, and strengthening financial intermediation.
- **Portfolio management and optimization:** Supporting the efficient administration of the bank's lending operations, including monitoring, collection, and risk control.
- **Lending and business expansion strategies:** Driving customer acquisition and expanding the reach of the bank's credit products.

According to the financial model included in Annex V, the projected minimum lending amounts are deemed adequate for the execution of the lending operations considered within the framework of the issuance;

D. Underlying Asset

The underlying assets of the ATLÁNTIDA01 debt tokens consist of a tokenized debt program organized into tranches, up to a maximum amount of USD \$300,000,000.00, representing payment obligations of BANCO ATLÁNTIDA EL SALVADOR, S.A., in its capacity as Issuer, to the holders of such tokens, in accordance with the terms and conditions set forth in this Relevant Information Document and in the specific terms of each tranche. Such obligations will be subject to the provisions of the issuance documentation, as well as to the applicable risks and factors described therein and in the specific terms of each tranche.

The issuance will be documented by a Master Debt Acknowledgment Agreement, which will constitute the legal instrument through which the Issuer will acknowledge the payment obligations that may arise on its part, including principal, interest, amortizations, redemptions, or

repayments owed to the holders of ATLÁNTIDA01 tokens, in accordance with the terms and conditions set forth in the issuance documentation.

Payment of principal and interest will be made in accordance with the terms, conditions, dates, frequency, and other financial characteristics set forth in the respective Public Offering Notice for each tranche.

The Master Debt Recognition Agreement must be executed within a maximum period of thirty (30) business days from the date the issuance is authorized by the National Commission on Digital Assets (CNAD).

It is important to clarify that the issuance program will be non-revolving; consequently, payments, amortizations, redemptions, or maturities of the issued tokens will neither restore nor increase the availability of the maximum authorized amount.

E. Market and Marketing

The ATLÁNTIDA01 token will feature:

- A primary market available from the start of the issuance.
- A secondary market will be available starting with the first placement of the issuance.

The sale or transfer price of ATLÁNTIDA01 tokens on the secondary market will be freely agreed upon between the seller and the buyer, in accordance with their own terms of trade. However, it is hereby established that the issuance of ATLÁNTIDA01 debt tokens, in both the primary and secondary markets, will be conducted through the platform of Banco Atlántida El Salvador, S.A., in accordance with the applicable terms and conditions.

The existence of a secondary market does not guarantee liquidity, available buyers, an exit price, or the recovery of invested capital.

F. Guarantees

The issuance of ATLÁNTIDA01 debt tokens is not backed by any specific, real, personal, fiduciary, and/or collateral security; they are backed by the Bank's general assets; investors are unsecured creditors, and their enforceability derives directly from the contractual relationship as set forth in the Debt Recognition Framework Agreement.

Furthermore, this unsecured nature means that, in the event of the issuer's default or liquidation, investors/tokenholders will participate and act individually and on an equal footing with other unsecured creditors, in accordance with the applicable rules of priority of claims, thereby assuming the general credit risk associated with the issuing institution. In the event of intervention, resolution, liquidation, revocation of authorization, or any other measure applicable to the bank,

the rights of tokenholders will be subject to the legal order of priority applicable to unsecured creditors.

For the sake of regulatory clarity, it is expressly stated that the Debt Recognition Framework Agreement does not constitute a guarantee in favor of investors, but rather consists of the legal mechanism through which the underlying credit obligation in favor of the token holders is formalized, documented, and made enforceable.

G. Distribution of Payments

- Payment of principal and interest will be made in accordance with the specific terms of each issued tranche, as set forth in the respective Public Offering Notice and in accordance with the characteristics of the issuance defined in this Material Information Document. Furthermore, any prepayment, repurchase, or redemption will be subject to the specific conditions applicable to each tranche, as determined in the corresponding notice.
- Such a token will have an interest rate that may be fixed or variable, to be defined for each tranche of the issuance. The Bank will pay interest on the balance of the debt tokens in each holder's account during the term of each tranche, calculated on a calendar-year basis.
- Investors holding ATLÁNTIDA01 tokens do not have any special priority with respect to the Bank's general distribution of income or to any other payments or obligations other than those expressly recognized in the issuance documents. Their economic rights derive from their individual participation in an unsecured collective loan structured through debt tokens, in accordance with the terms, conditions, maturities, and payment mechanisms set forth in this Material Information Document and in each offering circular for the tranches comprising the ATLÁNTIDA01 debt token issuance, as well as other documents applicable to the issuance.
- Investors' financial rights shall be understood as credit rights against the issuer, exercisable and proportional to the number of debt tokens held by each investor, and not as a preferential right to the Bank's total income, assets, or general resources.
- The Bank's financial stability does not authorize the unilateral suspension of payments, unless there is an expressly provided contractual, regulatory, or legal provision to that effect.
- It is expressly clarified that payment obligations rest solely with Banco Atlántida El Salvador, S.A., and do not extend to shareholders, parent companies, affiliates, or related entities, unless expressly agreed upon.

H. Business Model

The purpose of the issuance is to contribute to the diversification of the Bank's funding sources in order to support the financing of its lending operations, as well as funding matching, liquidity management, and other banking purposes permitted in the ordinary course of its operations. This approach ensures that financing remains efficient, accessible, and sustainable.

As part of its growth strategy, the Bank will promote the origination of loans through commercial partnerships and direct customer service, offering structured and customized financing solutions tailored to different profiles and financial needs. This model allows the Bank to expand its market reach and provide agile financing alternatives, thereby reducing barriers to access.

To mitigate credit risk, the bank establishes preventive reserves intended to cover potential contingencies arising from its active operations, in accordance with its internal policies and applicable regulations. Furthermore, the bank implements procedures for evaluating, monitoring, and recovering its loan portfolio, aimed at preserving credit quality and financial stability.

Furthermore, loan agreements entered into with customers include clear terms regarding potential defaults, including collection and recovery mechanisms in accordance with applicable law, which help protect the interests of the bank and its investors.

Finally, the Bank's business model includes the incorporation of digital assets as part of its financing strategy, within the framework of initiatives aimed at innovation and expanding access to financial services. In this context, these instruments are considered an alternative that can contribute to the funding of the Bank's lending operations, in accordance with market conditions and the applicable regulatory framework.

Additional Competitive Advantages:

- **Business Model Scalability:** Structured financing using digital assets makes it easier to expand operations into new markets, without the constraints of traditional financing models
- **Use of *blockchain* technology for security and transparency:** All transactions are recorded in an immutable manner, building trust among investors and customers.
- **Automation and Operational Efficiency:** Faster and more efficient processes through digital platforms, reducing approval times and administrative costs.

I. Technology Management and Security

The issuance will be managed through smart contracts on Algorand (ASC1), automating payment execution and ensuring traceability. The custody and security of the tokens will be the responsibility of BANCO ATLÁNTIDA EL SALVADOR, S.A., in its capacity as a Digital Asset Service Provider (PSAD) duly authorized by the National Commission on Digital Assets for the administration and execution of transactions.

J. Legal Framework

The issuance is carried out by BANCO ATLÁNTIDA EL SALVADOR, S.A., in its capacity as Issuer, and is governed by the provisions of the Digital Asset Issuance Law and other applicable regulations of the Republic of El Salvador, including:

- **Commercial Code**
- **Civil Code**
- **Tax Code**
- **Income Tax Act**
- **Commercial Registry Act**
- **Regulations on the Registry of Issuers and Issues**

K. Source of Funds for Issuance Obligations

I. Assets Applicable to the Atlántida01 Token Issuance

The issuance of debt tokens (ATLÁNTIDA01) is not backed by any specific, real, personal, fiduciary, and/or pledge-based guarantee; it is backed by the Bank's general assets; investors are unsecured creditors, and their enforceability derives directly from the contractual relationship in accordance with the provisions of the Framework Agreement for the Acknowledgment of Debt.

For the purpose of expressly and precisely defining the scope of the assets associated with the issuance of the tokens designated ATLÁNTIDA01, these will be legally supported by a Framework Agreement for the Acknowledgment of Debt, through which the Issuer will document and acknowledge the obligation to pay principal and interest to the token holders. Such an agreement will be executed for each tranche of the issuance, in accordance with the applicable specific terms and conditions. This agreement will be executed by BANCO ATLÁNTIDA EL SALVADOR, S.A., in its capacity as issuer. It is hereby noted that the structure of this Public Offering of Debt does not constitute a separate, independent, autonomous, or distinct asset pool from the Bank's general assets.

Consequently, the obligations arising from the issuance of the ATLÁNTIDA01 tokens are integrated into and backed by the general assets of BANCO ATLÁNTIDA EL SALVADOR, S.A., , which comprise the assets, rights, obligations, and other equity items recognized in accordance with applicable accounting, financial, and banking regulations. This means that the issuance is supported by the Bank's general capital base, with no specific or exclusive legal segregation of assets for this Public Offering of Debt, except for those accounting, contractual, or operational allocations necessary for the proper administration, control, and monitoring of the issuance.

The Public Offering of Debt in the amount of up to USD 300,000,000.00 is structured on the basis of a direct monetary obligation recognized by the Bank through the aforementioned Debt Recognition Agreement, which constitutes the principal obligating document backing the issuance. Such obligation shall be enforceable in accordance with the terms, conditions, deadlines, payment mechanisms, and other provisions set forth in the agreement and in the constitutive documents of the Public Offering of Debt.

The assets associated with the issuance of the ATLÁNTIDA01 tokens shall be deemed, for all legal and contractual purposes, to be part of the Bank's general assets, without prejudice to the

internal identification of the rights, cash flows, obligations, payment mechanisms, accounting records, or administrative controls related to the issuance. Such identification shall serve operational, accounting, and transparency purposes vis-à-vis the token holders, but shall not imply the creation of a special-purpose fund, trust, separate fund, independent vehicle, or autonomous asset structure.

BANCO ATLÁNTIDA EL SALVADOR, S.A. will act in its capacity as issuer and contractual obligor vis-à-vis the holders of ATLÁNTIDA01 tokens, assuming liability in accordance with the terms and scope established in the debt instrument known as the Framework Agreement for the Acknowledgment of Debt, in the issuance documents, and in applicable law. Accordingly, any claim, action, or proceeding related to the issuance must be brought in accordance with the applicable contractual framework, recognizing that the obligations assumed by the Bank form part of its general institutional assets.

The purpose of this equity structure is to provide legal certainty, contractual transparency, and proper identification of the obligations arising from the Public Offering of Debt, clearly establishing that the issuance of ATLÁNTIDA01 tokens is backed by the general equity of BANCO ATLÁNTIDA EL SALVADOR, S.A., without this implying the creation of a separate asset pool or the exclusion of said obligation from the Bank's balance sheet, records, or general financial liability, to the extent required by applicable financial, accounting, and regulatory standards.

L. Token Acquisition Process

The placement of the debt tokens will be conducted through Banco Atlántida. Potential investors may express their interest in acquiring the tokens at a Bank branch or through a Bank representative. To make the investment, the individual must meet the established customer onboarding, identification, and due diligence requirements and have an active checking or savings account. If the individual does not have an account, they may request to open one during the process, subject to compliance with applicable requirements and internal policies.

Investors must understand and accept the characteristics, conditions, and risks of the offering as set forth in this Material Information Document. Additionally, they must have sufficient funds available in their account to cover the total amount of tokens they wish to purchase.

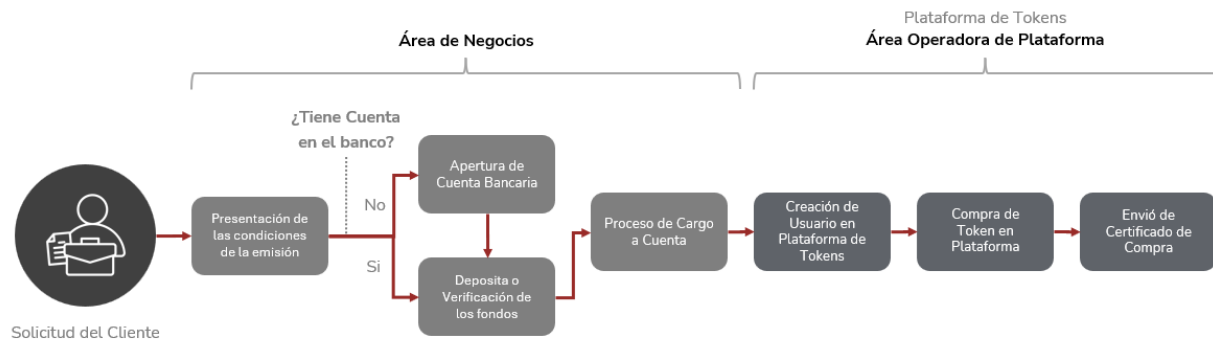
II. Investment Application

When a potential investor expresses interest in purchasing the tokens, Bank staff will provide information on the characteristics, conditions, and risks of the offering, as set forth in this Material Information Document. The investor must specify the amount they wish to invest and have a checking or savings account with Banco Atlántida. If they do not have an account, they may request to open one. Additionally, they must deposit or maintain sufficient funds in their account to complete the purchase. Once the availability of funds has been verified, the corresponding

amount debited from the investor's account in accordance with the Bank's internal procedures will be

III. Acquisition and Allocation of Tokens

Once the necessary procedures are completed, the investor is created or activated on the digital asset platform. Subsequently, the purchase and allocation of the tokens to the investor will be processed. Once the transaction is completed and recorded on the *blockchain*, the issued corresponding purchase certificate as proof of the acquired tokens.



It is hereby disclosed that, if a fixed interest rate is applicable, such rate shall be set within a range of two percent (2.00%) to eight percent (8.00%) per annum. The specific fixed interest rate for each tranche of the issuance shall be separately determined and disclosed. Therefore, the range indicated above shall serve as the framework within which Banco Atlántida El Salvador, S.A. will determine the fixed interest rate applicable to each tranche, with the final rate being subject to the particular terms and conditions of the relevant tranche and its disclosure in the offering documents referred to above.

IV. Considerations for the Acquisition of Tokens

Payment for the purchase of tokens will be made exclusively in currencyfiat, either by debiting the investor's checking or savings account at Banco Atlántida, or through any other payment method previously agreed upon with the client and authorized in accordance with the Bank's internal processes.

The Bank has independent processes through which it may receive stablecoins and convert them to currencyfiat, subject to compliance with applicable requirements, conditions, and procedures. Once the funds have been credited to the investor's bank account, the corresponding charge for the purchase of the tokens may be made.

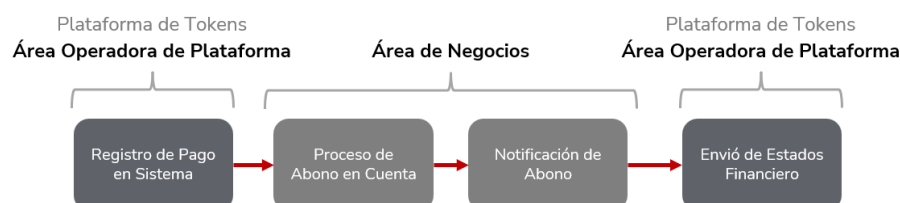
The token acquisition process will be subject to established operational controls, including dual controls, validations, report generation, reconciliations, and continuous monitoring of transactions. These controls will ensure the traceability of funds and allocated tokens, in accordance with the Bank's internal policies and procedures.

M. Yield Payment Process

Interest payments will be made in accordance with the frequency and conditions established for each tranche token. Returns will depend on the amount actually purchased in each tranche, its placement date, the applicable interest rate, the corresponding period, and any other conditions set forth in this DIR.

The administration, validation, and execution of payments will be carried out in accordance with the Bank's internal procedures and the frequency defined for each tranche. The calculation and tracking of such returns will be conducted through the token platform.

On the applicable date, the token platform will record the interest payment applicable to each investor, in accordance with the terms established for each tranche. Based on this record, the interest will be credited to the investor's bank account in accordance with internal controls and procedures applicable. Subsequently, the platform will send the investor the corresponding financial statement as proof of the transaction.



The interest payment process will be subject to the operational controls established by Banco Atlántida, including dual controls, validations, report generation, and continuous . These controls will ensure the correct calculation, recording, and payment of interest to each investor, in accordance with the Bank's internal policies and procedures.

If the interest rate is determined to be fixed, such rate shall be set within a range of two percent (2.00%) to eight percent (8.00%) per annum. The specific fixed interest rate applicable to each tranche of the issuance shall be separately determined and disclosed. Therefore, the range indicated above shall serve as the parameter within which Banco Atlántida El Salvador, S.A. will establish the fixed interest rate for each tranche, with the final rate being subject to the specific terms and conditions of the relevant tranche and its disclosure in the Placement Notice.

V. Considerations for Debt Service Payments:

Obligations arising from the ATLÁNTIDA01 debt tokens will be met using cash flows and resources derived from the ordinary operating activities of BANCO ATLÁNTIDA EL SALVADOR, S.A., including, among others, revenue generated by its total loan portfolio, financial investments, interest, commissions, banking services, and other activities inherent to its financial intermediation business.

For clarity, payment of the obligations arising from this issuance is not limited to or backed exclusively by the loan portfolio originated with the proceeds from the sale of the ATLÁNTIDA01 tokens, but will be met from the general equity, liquidity, and payment capacity of BANCO ATLÁNTIDA EL SALVADOR, S.A., in its capacity as issuer and principal obligor.

VI. Priority of Payments:

The obligations arising from the ATLÁNTIDA01 debt tokens constitute direct, general, unconditional, and unsecured obligations of BANCO ATLÁNTIDA EL SALVADOR, S.A. Consequently, the holders of the tokens shall have the status of ordinary unsecured creditors of the Bank and shall enjoy a right to payment on an equal footing (*pari passu*) with respect to the Issuer's other present and future unsecured obligations that are not subject to any preference or privilege established by law.

In the event of receivership, resolution, compulsory liquidation, or any other legal proceeding applicable to the Bank, the collection rights of holders of ATLÁNTIDA01 tokens will be subject to the order of priority for payments established in the banking and financial laws currently in force in the Republic of El Salvador, and this issuance does not have any specific guarantee, special privilege, or priority of payment over other unsecured creditors of the Issuer.

N. Conclusion

The program will be structured and administered by BANCO ATLÁNTIDA EL SALVADOR, S.A., the first bank in the country authorized by the National Commission on Digital Assets (CNAD) as a Digital Asset Service Provider (PSAD). The *blockchain* technology used enables the use of smart contracts on the Algorand platform, ensuring transparency, efficiency, and lower transaction costs.

This issuance allows investors to consider participating in a program that incorporates elements of financial innovation and is linked to economic development initiatives. The proposed model incorporates the use of digital technologies as part of its structure, integrating mechanisms that contribute to the transparency and traceability of transactions.

Potential conflicts of interest have been identified in connection with the token issuance, arising primarily from the convergence of multiple roles and functions assumed by the institution, including, among others, its capacity as an issuer and as a Digital Asset Service Provider (PSAD). In light of the foregoing, the entity has designed a Conflict of Interest Management Policy aimed

at ensuring the proper identification, mitigation, and disclosure of such risks, in line with best corporate governance practices and to protect the interests of investors.

See Annex VII—Issuer Policies.

This Material Information Document (DIR) was prepared in June 2026 and is available free of charge on the website of BANCO ATLÁNTIDA EL SALVADOR, S.A. and through the official channels of BANCO ATLÁNTIDA EL SALVADOR, S.A.

o. Investor Disclosures

The investor expressly acknowledges and agrees that:

- The registration or authorization of the issuance with the National Commission on Digital Assets (CNAD) does not imply any certification, validation, or guarantee regarding the quality, value, structure, financial compliance, or performance of the Digital Assets, nor regarding the Issuer's solvency, liquidity, or ability to pay.
- Digital Assets may lose all or part of their value due to market conditions, technological, operational, or regulatory risks, or other factors.
- Digital Assets may lack liquidity, and there may or may not be a secondary market, buyers, or mechanisms that allow for their timely sale or disposal.
- Digital Assets may not be freely tradable or transferable, as they are subject to legal, regulatory, contractual, technological, or KYC/AML compliance restrictions.
- Investing in Digital Assets does not guarantee future returns, expected returns, or financial results of any kind.
- The Bank's participation in the issuance does not constitute a guarantee of yield, repurchase, liquidity, payment, financial backing, or risk mitigation.
- No tranche of the offering may exceed the maximum authorized term of the offering or have a maturity date later than the maximum term of 120 months.

The obligations arising from this issuance are the direct and exclusive obligations of Banco Atlántida El Salvador, S.A., without any guarantee, surety, or joint liability on the part of the parent company or other related entities.

Key Features of the ATLÁNTIDA01 Issue

Type of Public Offering of Digital Assets	Public Offering of Debt
Issuer	Banco Atlántida El Salvador
Issuer No.	EAD-0053
Type of Digital Asset	Debt Token
Token Name	ATLÁNTIDA01
Token Ticker Symbol	ATLÁNTIDA01
Issuance Registration No.	AD-00260
Total Issue Amount	The maximum amount of the issuance is USD \$300,000,000.00 (THREE HUNDRED MILLION UNITED STATES DOLLARS), during the authorization period, which is up to 10 years. BANCO ATLÁNTIDA EL SALVADOR, S.A., in its capacity as issuer, may conduct multiple offerings in tranches. All tranches of the offering will be identified under the general designation ATLÁNTIDA01. Notwithstanding the foregoing, each tranche will have a specific and consecutive identification number, in accordance with its order of placement, using the designation ATLÁNTIDA01 – Tranche 1, ATLÁNTIDA01 – Tranche 2, ATLÁNTIDA01 – Tranche 3, and so on. Under no circumstances may the total sum of the face value of the Debt Tokens issued exceed the duly authorized maximum amount. The total amount of the issuance was strategically determined by considering the Bank's funding needs, the expected volume of active transactions, liquidity requirements, maturity and rate matching management, as well as its capital and regulatory capacity to assume the obligations arising from this issuance.

Underlying Assets

The underlying asset of the ATLÁNTIDA01 debt tokens consists of a tokenized debt program divided into tranches, up to a maximum amount of USD \$300,000,000.00, representing direct, general, and unconditional payment obligations of BANCO ATLÁNTIDA EL SALVADOR, S.A., in its capacity as Issuer, in favor of the holders of such tokens, in accordance with the terms and conditions set forth in this Material Information Document and in the specific terms of each tranche.

The issuance will be documented by a Master Debt Acknowledgment Agreement, which will constitute the legal instrument through which the Issuer will formally acknowledge its obligation to pay principal, interest, amortizations, redemptions, or reimbursements owed to the holders of ATLÁNTIDA01 tokens.

The Master Debt Acknowledgment Agreement must be executed within a maximum period of thirty (30) business days from the date the issuance is authorized by the National Commission on Digital Assets (CNAD).

The issuance program will be non-revolving; consequently, payments, amortizations, redemptions, or maturities of the issued tokens will neither restore nor increase the availability of the maximum authorized amount.

Token Guarantees

The issuance of the debt tokens (ATLÁNTIDA01) is not backed by any specific, real, personal, fiduciary, and/or collateral security; it is backed by the Bank's general assets; investors are unsecured creditors, and their claim arises directly from the contractual relationship in accordance with the provisions of the Debt Recognition Framework Agreement.

Furthermore, this unsecured nature means that, in the event of the issuer's default or liquidation, investors/tokenholders will participate and act individually and on an equal footing with other unsecured creditors, in accordance with the applicable rules governing the priority of claims, thereby assuming the general credit risk associated with the issuing institution. In the event of intervention, resolution, liquidation, revocation of authorization, or any other measure applicable to the bank, the rights of tokenholders will be subject to the legal order of priority applicable to unsecured creditors.

For the purposes of regulatory clarity, it is expressly stated that the Debt Recognition Framework Agreement does not constitute a guarantee in favor of investors, but rather the legal mechanism through which the underlying credit obligation in favor of the token holders is formalized, documented, and made enforceable.

	Each token will have a face value of USD 1.00 and will be issued with zero decimal places; therefore, there will be no fractional tokens, and all acquisitions, transfers, or redemptions must be made in whole units. The debt tokens to be issued constitute negotiable obligations in favor of their respective holders and represent their individual participation in a collective unsecured credit facility owed by the Issuer. Each token confers a credit right against the Issuer, in proportion to the participation acquired in the respective tranche, without granting any equity, political, corporate, asset ownership, or management rights over the Bank. Investors who acquire ATLÁNTIDA01 debt tokens will be entitled to receive payment of principal and interest on the outstanding balance of the tokens during the term of the issuance, in accordance with the characteristics defined for each tranche. However, the Issuer may make partial payments of principal and/or interest in accordance with the Offering Circular for each Tranche and applicable documents.
Token Unit	Minimum Purchase Amount per Investor. The minimum purchase amount for the ATLÁNTIDA01 token offering is USD \$1,000.00 (ONE THOUSAND UNITED STATES DOLLARS), equivalent to the purchase of one thousand tokens. Minimum Placement Amount for the Validity of the Offering. The minimum placement amount required to validate the validity of the offering is USD \$500,000.00 (FIVE HUNDRED THOUSAND UNITED STATES DOLLARS). Minimum and Maximum Trading Amounts The issuer will have a maximum period of six (6) months to reach this minimum initial placement amount. If this amount is not reached within the established period, a refund mechanism will be activated to guarantee investors a full refund of their invested capital. This process will be managed through the trading platform used for the offering, ensuring transparency and efficiency at every stage. Investors participating in this Public Offering will be entitled to recover their investment if the minimum placement amount of USD \$500,000.00 is not reached by the end of the defined period, or in the event of cancellation of the offering, in accordance with the mechanism detailed below:

Refund Process.

If, at the end of the six (6)-month placement period for the Offering, the minimum initial placement amount of USD \$500,000.00 (FIVE HUNDRED THOUSAND UNITED STATES DOLLARS) is not reached, the offering will not take effect, and the principal contributed by investors will be refunded in full, in accordance with the terms and conditions set forth in this Material Information Document (MID) and in the documentation for the applicable tranche.

This mechanism ensures that the issuance program will only proceed if the defined minimum level is met. Funds received during the placement process will be tracked through internal accounts and records.

It is important to note that the refund will not include returns or interest, since the issuance will not have become effective.

To enhance the transparency, traceability, and security of the process, the Digital Asset Service Provider (PSAD) will be responsible for managing the refund of funds.

The refund procedure will be carried out in accordance with the following steps:

1. Verification of Compliance with the Placement Condition:

- Upon expiration of the established period, verification will be conducted to determine whether the minimum amount required for the public offering to continue has been reached.
- If this condition is not met, the procedure for returning funds to token holders will be initiated in accordance with established internal controls and procedures.

2. Notification to Token Holders:

- Token holders will be informed, through the designated communication channels, of the failure to meet the minimum placement amount.
- The notification will include the procedure for refunding funds, the applicable deadlines, and any relevant information for investors.

Such notification will be provided within 5 business days following the expiration of the placement period.

3. Refund Process:

- The Issuer will proceed to refund one hundred percent (100%) of the capital contributed by each token holder.

- No returns or distributions will be recognized, as the issuance will not have met the necessary conditions to begin generating returns.

- The refund will be made within a maximum of fifteen (15) business days from the date of notification to the tokenholders.

4. Confirmation of the Refund:

- Prior to processing the refunds, the necessary internal reconciliations and validations will be conducted to ensure the accuracy of the amounts to be refunded.

- Tokenholders will be notified of the completion of the refund process through the communication channels established for the token issuance.

- Documentary evidence and records will be maintained to verify the amounts refunded, the payment dates, and the transactions carried out as part of the refund process.

5. Guarantee of Transparency:

- The entire refund process will be recorded on the *blockchain* platform used for the issuance, providing an immutable record that reinforces investor confidence.

- Compliance reports certifying the completion of the process may be issued.

With this structure, BANCO ATLÁNTIDA EL SALVADOR, S.A. strengthens investor confidence by offering a capital protection mechanism, ensuring financial viability and compliance with the conditions established in the offering.

Regarding the custody of funds from the sale of tokens, all proceeds from the offering until the minimum initial offering amount is reached may not be used by the issuer. Once the minimum initial offering amount is reached, the funds may be made available to the Treasury Department.

Notice Regarding the Issuance's Placement Tranches

During the term of the Offering, the Issuer may conduct successive token offerings structured in different tranches, each with terms and interest rates defined at the time of the offering, based on market conditions and the amount of tokens available, as determined by the Issuer. The specific terms of each tranche will be reported in advance to the CNAD, in accordance with the procedures established by the Commission, and will

	be disclosed to the investing public through the respective public offering notices. For each tranche of the offering, the Issuer must specify in the corresponding public offering notice, at a minimum, the placement date, tranche number, maturity date, interest rate, payment frequency, trading platform, and early redemption terms. No tranche may exceed the maximum authorized term of the issuance or have a maturity date later than the maximum term of 120 months.
Rights of the Token Holder	Token holders shall enjoy the following rights: Return of the face value and an interest rate: The issuer will pay interest on each holder's token balance during the term of the issuance, calculated on a calendar-year basis. The tokens may be issued at par value, accruing a fixed or variable interest rate established by the issuer at the time of each issuance. Both principal and interest may be paid monthly, quarterly, semiannually, annually, or upon maturity, as determined prior to the issuance of each tranche. When the placement is at par value and accrues interest, interest will be paid periodically, either at a fixed or variable rate, with different principal repayment schedules. If the rate is variable, it may be a step-up interest rate, a step-down interest rate, or a variable rate based on a base rate, which may be: (i) the Weighted Average Basic Lending Rate (TIBP); or the Secured Overnight Financing Rate (SOFR) or Term SOFR, which is the forward-looking term rate based on SOFR. If the variable trading rate is determined using the TIBP as the base rate, the Weighted Average Basic Deposit Rate for 30-, 90-, or 180-day term deposits in the Financial System, as published by the Central Reserve Bank of El Salvador during the week prior to the trade, shall be used. A surcharge will be added to this base rate, which will remain fixed throughout the term of the issue. This surcharge may not be less than zero point ten percent (0.10%) per annum and must be established prior to the issuance. If the variable rate for the transaction is determined using SOFR, the rate published by the CME Group (or its successor designated by the Relevant Government Agency) on its website or on platforms that publish said index for the 30-, 90-, or 180-day terms shall be used. The applicable rate shall be the one published on the Wednesday of the week preceding the transaction. A surcharge will be added to this base rate, which will remain fixed throughout the term of the placement. Said surcharge may not be less than zero point ten percent (0.10%) per annum and must be

established prior to the negotiation of the placement. The interest rate may be fixed or variable at the issuer's discretion and will be determined prior to each transaction, remaining in effect for the term of each placement and must be published in the official media. BANCO ATLÁNTIDA EL SALVADOR, S.A. may establish, prior to the placement, a minimum rate and a maximum rate to be paid during the term of the issue. If the sum of the base rate plus the fixed surcharge is equal to or greater than the minimum rate but does not exceed the maximum rate, the resulting rate will be paid. If the sum of the base rate plus the fixed surcharge is less than the minimum rate, the established minimum rate will be paid. Conversely, if that sum exceeds the maximum rate, the maximum rate defined will be paid to the Tokenholder. If the interest rate is variable, it will be adjusted monthly, quarterly, or semiannually under the same conditions specified for the initial determination of the interest rate. Interest rate adjustments must be communicated to the Tokenholders via an official notice.

Purchasers acknowledge and agree that the Bank will not act as an independent representative of the Tokenholders, nor will it assume fiduciary duties, duties of collective representation, common defense, management of joint interests, or act on behalf of the purchasers, except for those obligations expressly assumed in the issuance documentation or imposed by applicable regulations.

Tokenholders shall exercise the rights arising from the digital assets individually, autonomously, and directly, in accordance with the terms of issuance, the Digital Asset Issuance Act, and other applicable regulations. Any form of joint action, representation, or collective exercise of rights by tokenholders shall require the existence of an express legal basis, which must be established in advance, sufficiently and verifiably, and shall include only the following cases: (i) an express mandate conferred in accordance with applicable law; (ii) a duly formalized assignment of rights; or (iii) mechanisms for collective representation or coordination expressly established in the issuance documentation or in subsequent validly adopted agreements, provided they are compatible with the current regulatory framework. Apart from the cases indicated above, the existence of implicit, tacit, or supplementary mechanisms of collective representation shall not be recognized, nor shall any person be deemed to hold the authority to act on behalf of or in the interest of the tokenholders as a group. Furthermore, no provision contained in this Material Information Document shall be interpreted as the creation, recognition, or indirect establishment of a common representative, nor as the conferral of powers of collective representation in the absence of an express designation in accordance with the law.

The interest rate, whether fixed or variable, will be determined prior to the placement of each tranche and communicated through official channels.

For the fixed rate, interest will accrue and be calculated daily on the nominal balance of the tokens held by each investor, using a 365-day basis.

Interest = Principal Balance × Fixed Annual Interest Rate × (Number of Days in the Period / 365)

For the variable rate, the TIBP, SOFR, or Term SOFR—as established prior to the placement of each tranche—will be used as a reference, plus a fixed surcharge of no less than 0.10% per annum:

Variable Interest Rate = Reference Rate + Spread

Interest will also accrue and be calculated daily, applying the resulting variable rate:

Interest = Outstanding Principal Amount × Fixed Annual Interest Rate
× (Number of Days in the Interest Period / 365)

When minimum or maximum rates are established, the resulting rate will be subject to those limits. The applicable rate, the surcharge, the payment frequency, and other conditions will be disclosed prior to the placement of each tranche. The calculation and tracking of returns will be performed through the token platform.

The issuance of ATLÁNTIDA01 debt tokens includes an early redemption option by BANCO ATLÁNTIDA EL SALVADOR, S.A., which allows it to redeem or repay, in whole or in part, the issued tokens prior to the maturity date of the corresponding tranche. The tokens subject to redemption will be withdrawn from circulation and permanently destroyed (burned).

This option provides the Issuer with the flexibility to optimize the management of its financial structure, reduce interest payment obligations, and improve the administration of its debt obligations, in line with the program's evolution and market conditions.

The Issuer will notify the National Commission on Digital Assets (CNAD) of the dates, number of tokens, and repurchase prices at least 10 days in advance, ensuring transparency in the process and guaranteeing that investors have sufficient information to make decisions about their investment.

The Issuer's option to redeem ATLÁNTIDA01 tokens early will apply to all tranches during the term of the issuance.

Early Redemption

Criteria for determining whether the issuer will exercise the early redemption option:

- If market conditions are favorable for the issuer to exercise the option
- Improvements in the financial or cash flow profile that allow for early repayment.
- Plans for refinancing at a lower cost.
- Corporate strategies to optimize liabilities or financial structure.

The amount to be paid by the Issuer in the event of exercising the early redemption option for ATLÁNTIDA01 tokens will be equal to the principal owed as of the effective date of redemption, plus interest accrued and unpaid through that date.

The early redemption amount will be determined according to the following formula:

Redemption Amount = Principal Owed + Accrued but Unpaid Interest.

The repurchase, if applicable, will be executed through the platform of BANCO ATLÁNTIDA EL SALVADOR, S.A., in its capacity as an authorized Digital Asset Service Provider, in line with best market practices, thereby strengthening investor confidence and security.

Token Interest Accrual Mechanism	The tokens will accrue interest in favor of their holders on the outstanding principal balance during the term of each tranche of the Offering, in accordance with the applicable interest rate defined at the time of placement. The interest rate may be fixed or variable, as determined by the Issuer prior to each placement, based on market conditions. Interest payments will be made in accordance with the frequency established for each tranche, which may be monthly, quarterly, semiannually, annually, or at maturity, as specified in the Public Offering Notice for the corresponding tranche. If the interest rate is determined to be fixed, such rate shall be set within a range of two percent (2.00%) to eight percent (8.00%) per annum. The specific fixed interest rate applicable to each tranche of the issuance shall be separately determined and disclosed. Therefore, the range indicated above shall serve as the parameter within which Banco Atlántida El Salvador, S.A. will establish the fixed interest rate for each tranche, with the final rate being subject to the specific terms and conditions of the relevant tranche and its disclosure in the Placement Notice.
Total Issue Amount	The total amount of the Offering is up to USD \$300,000,000.00 (THREE HUNDRED MILLION UNITED STATES DOLLARS), which may be offered in part and on a progressive basis through various tranches, subject to market conditions and as determined by the Issuer in each Public Offering Notice.
Number of tokens to be issued at the time of issuance	The maximum number of authorized tokens is up to 300,000,000 tokens. This amount corresponds to the maximum number of tokens that may be issued under the issuance program, which may be offered in part and on a progressive basis through various tranches, subject to market conditions and as determined by the Issuer in each Public Offering Notice. Consequently, not all authorized tokens will necessarily be issued or placed at the start of the Offering.

**Principal and Other
Payments to Token
Holders**

Holders of ATLÁNTIDA01 tokens will be entitled to receive interest payments and the return of their invested capital within the timeframe stipulated for each issued tranche, in accordance with the established terms.

1. Payment Schedule

- Interest and principal payments will be made in accordance with the Offering Notice for each Tranche and applicable documents; however, partial payments of principal and/or interest may be made. Any early payment, redemption, prepayment, or repurchase will only be permitted when provided for in the respective Tranche Notice and in accordance with its specific conditions. Before making such a payment, the issuer will take into account its financial stability and any outstanding obligations.

2. Payment Frequency

- Payment of interest, returns, or other amounts derived from the tokens will be made in accordance with the frequency, dates, calculation methods, and other conditions established for each issued tranche in the corresponding documents.

The Issuer may make partial or advance payments, provided that such payments are permitted under the documents applicable to the respective tranche. To this end, the Issuer may consider its liquidity, financial stability, outstanding obligations, regulatory requirements, market conditions, and other factors relevant to the proper management of the issuance.

3. Guarantee and Security of the Investment

- The issuance of debt tokens (ATLÁNTIDA01) is not backed by any specific guarantee, whether in the form of real or personal security, fiduciary arrangements, and/or pledges; however, it is backed by the general assets of the issuer, BANCO ATLÁNTIDA EL SALVADOR, S.A., and therefore constitutes an unsecured obligation. Consequently, investors hold the status of ordinary creditors of the issuer, with no preference or special priority over other unsecured creditors.

The Debt Acknowledgment Framework Agreement does not constitute a guarantee in favor of investors, but rather the legal mechanism through which the underlying credit obligation in favor of the token holders is formalized, documented, and made enforceable; this agreement will be executed within a period not exceeding 30 business days, counted from the date of acquisition of the tokens.

However, the obligations arising from ATLÁNTIDA01 will be unsecured,

and, unless otherwise required by law or in the case of a debt with specific priority, they will be treated on an equal footing with the Bank's other common unsecured obligations.

4. Transparency and Payment Management

- Interest payments and principal repayments will be processed through automated mechanisms supported by *blockchain* technology on the Algorand network, which will generate the corresponding payment instructions in accordance with the terms of the issuance. The execution and final validation of payments will require operational intervention by the Bank, ensuring applicable internal controls, as well as the traceability and transparency of each transaction.

The Bank's financial stability does not permit the unilateral suspension of agreed-upon payments, unless there is an expressly provided contractual, regulatory, or legal provision to that effect.

Term of the Issue

The public offering will have a term of no more than 120 months; however, since the offering will be conducted in tranches, no single tranche will exceed the total term of the offering.

At the end of the offering period, the tokens will be canceled once the principal and interest have been paid.

The issuing company reserves the right to delist the issued tokens in the event of cyberattacks or law enforcement requests.

Are decentralized ledgers () and smart contracts or equivalents used?

The Issuer, BANCO ATLÁNTIDA EL SALVADOR, S.A., will use the Algorand *blockchain* protocol, recognized for its advanced security through verifiable random functions (VRF) and its scalability, with processing times of less than 3 seconds per block.

Smart contracts, developed under the Algorand Smart Contracts (ASC1) standard, will manage the issuance, transfer, and trading of the tokens, ensuring compliance with predefined conditions such as transfer

	restrictions or lock-up periods. These tools guarantee transparency and security in all transactions. The custody and security of the tokens will be the responsibility of BANCO ATLÁNTIDA EL SALVADOR, S.A., in its capacity as an authorized Digital Asset Service Provider that implements advanced technologies such as multi-factor authentication, data encryption, and continuous monitoring. These robust measures reinforce investor confidence in the secure management of their digital assets.
Tradability and Secondary Market	The ATLÁNTIDA01 token will have a primary market from the start of the issuance, and the secondary market will be available starting with the first placement of the first tranche of the issuance. Both markets will be developed and managed exclusively on the platform of the Digital Asset Service Provider (PSAD) BANCO ATLÁNTIDA EL SALVADOR, S.A., ensuring transparency, efficiency, and accessibility for investors. The existence of a secondary market does not guarantee liquidity, the availability of buyers, an exit price, stability in the token's value, or the full or partial recovery of the invested capital. The sale or transfer price of ATLÁNTIDA01 tokens on the secondary market will be freely agreed upon between the seller and the buyer, in accordance with the trading conditions agreed upon by the parties and the procedures established by the PSAD.
Market Oversight	BANCO ATLÁNTIDA EL SALVADOR, S.A., in its capacity as issuer, undertakes to constantly monitor and oversee market conditions and dynamics, focusing its efforts on preventing and mitigating any practices that could lead to the manipulation of securities traded on the platform where the tokens are sold, prioritizing the early detection and prevention of unauthorized activities or manipulation of the platform.
Listing	The ATLÁNTIDA01 token will be listed and made available for trading on the platform administered by BANCO ATLÁNTIDA EL SALVADOR, S.A., in its capacity as an authorized Digital Asset Service Provider, once the applicable internal procedures, technological controls, operational validations, compliance requirements, and regulatory authorizations have been fulfilled. The availability of the token on the platform will be subject to the internal operational management of the corresponding tranche, the publication of the respective Public Offering Notice, the technological

	configuration of the digital asset, and compliance with the conditions set forth in this Material Information Document, the respective Placement Tranche Notice, and the issuance documents.
Settlement	Payments of principal, interest, amortizations, redemptions, or reimbursements arising from the ATLÁNTIDA01 token may be obtained through the main trading platform, managed by BANCO ATLÁNTIDA EL SALVADOR, S.A.
Sales Restrictions	The token must not be distributed to entities or countries subject to sanctions according to international sanctions lists.
Trading Currency	United States dollars.
Payment Methods for Purchasing the Offered Assets	Payment Methods The subscription and purchase of tokens issued under this program will be conducted exclusively through direct debit, and the investor must maintain sufficient funds in the bank account previously registered and authorized for this purpose. At the time of purchase, the investor expressly authorizes Banco Atlántida El Salvador, S.A. to debit from the designated account the amounts corresponding to the value of the subscribed Tokens.
Issuance Arranger	BANCO ATLÁNTIDA EL SALVADOR, S.A. 1st West Street and Constitución Boulevard #3538, Escalón Neighborhood, San Salvador. https://www.bancoatlantida.com.sv/ Contact Phone Number: +503 2223-7676 CNAD Registration Number – PSAD-0035.
Digital Asset Services Provider	BANCO ATLÁNTIDA EL SALVADOR, S.A. 1st West Street and Constitución Boulevard #3538, Escalón Neighborhood, San Salvador. https://www.bancoatlantida.com.sv/ Contact Phone Number: +503 2223-7676 CNAD Registration Number – PSAD-0035. BANCO ATLÁNTIDA EL SALVADOR, S.A. acts as a registered Digital Asset Service Provider (PSAD), ensuring the proper management and custody of the tokens issued under this offering. For the operational execution of the issuance and administration of the digital assets, BANCO ATLÁNTIDA EL SALVADOR, S.A. has

implemented a specialized technological infrastructure that provides the platform for the issuance, trading, and management of the digital assets.

Digital Asset Certifier

TR CAPITAL, S.A. DE C.V.

Calle Cuscatlán, #4312, Col. Escalón, San Salvador, El Salvador.
<https://www.trcapital.net/>

CNAD Registration Number - CERT-0003

Designated Contact Person: Héctor Ramón Torres Córdova

Contact Phone Number: +503 2538-6360

Contact email: info@trcapital.net

Digital Asset Custodian

BANCO ATLÁNTIDA EL SALVADOR, S.A.

1st West Street and Constitución Boulevard #3538, Escalón
Neighborhood, San Salvador.

Contact phone number: +503 2223-7676

<https://www.bancoatlantida.com.sv/>

CNAD Registration Number – PSAD-0035

It is responsible for the custody and administration of digital assets issued under the ATLÁNTIDA01 token. Its primary function is to ensure the security, traceability, and transparency of transactions through *blockchain* technology, in compliance with applicable regulatory provisions.

Applicable Laws

Laws of the Republic of El Salvador

To ensure the transparency and security of the issuance, the proceeds will be managed through smart contracts developed on the Algorand *blockchain*, in accordance with the Algorand Smart Contracts (ASC1) standard, which will generate the corresponding payment instructions in accordance with the terms of the issuance. The execution and final validation of payments will require operational intervention by the Bank, ensuring applicable internal controls, as well as the traceability and transparency of each transaction.

These contracts will ensure compliance with predefined conditions, such as transfer restrictions or lock-up periods. Additionally, the custody and security of the tokens will be the responsibility of BANCO ATLÁNTIDA EL SALVADOR, S.A., which implements advanced technologies such as multi-factor authentication, data encryption, and continuous monitoring, thereby reinforcing investor confidence in the secure management of digital assets.

The total amount of the issuance is USD \$300,000,000.00, corresponding to 300,000,000 tokens. To ensure the viability of the public offering, at least the minimum amount established must be placed during the initial placement period, in accordance with the terms defined in the issuance.

The issuance of the debt tokens (ATLÁNTIDA01) is not backed by any specific collateral, whether real or personal, fiduciary, and/or pledged; however, it is backed by the general assets of the issuer, BANCO ATLÁNTIDA EL SALVADOR, S.A., and is therefore classified as an unsecured obligation. Consequently, investors hold the status of ordinary creditors of the issuer, without any preference or special priority over other unsecured creditors.

For the sake of regulatory clarity, it is expressly stated that the Master Debt Acknowledgment Agreement does not constitute a guarantee in favor of the investors, but rather the legal mechanism through which the underlying credit obligation in favor of the token holders is formalized, documented, and made enforceable. Consequently, although the issuance lacks specific guarantees, the issuer's payment obligation is duly recognized and contractually backed by said instrument. This Framework Agreement for the Acknowledgment of Debt will be executed by the issuer, BANCO ATLÁNTIDA EL SALVADOR, S.A., and is governed by the Digital Asset Issuance Act and other applicable Salvadoran regulations, such as the Commercial Code and the Civil Code. This regulatory framework ensures that all transactions are reliable, transparent, and auditable.

However, the obligations arising from ATLÁNTIDA01 will be unsecured, and, unless otherwise required by law or in the case of debt with specific priority, they will be treated on an equal footing with the Bank's other unsecured common obligations.

Atlántida01 tokens represent an alternative for investors to access potential returns, incorporating elements that contribute to transparency and traceability in their registration. Furthermore, their use can contribute to the country's economic and social development. This mechanism is framed as an innovative investment model within the financial system, supported by the adoption of advanced technology.

This offering does not constitute an offer available in any jurisdiction where it would be considered illegal.

PARTICIPANTS

Issuer

BANCO ATLÁNTIDA EL SALVADOR, S.A.

1st Poniente Street and Constitución Boulevard #3538, Escalón
Neighborhood, San Salvador

<https://www.bancoatlantida.com.sv/>

Contact Phone Number: +503 2223-7676

CNAD Registration Number: EAD-0053

Digital Asset Service Provider	BANCO ATLÁNTIDA EL SALVADOR, S.A. 1st Street West and Constitución Boulevard #3538, Escalón Neighborhood, San Salvador. https://www.bancoatlantida.com.sv/ Contact Phone Number: +503 2223-7676 CNAD Registration Number – PSAD-0035. BANCO ATLÁNTIDA EL SALVADOR, S.A. acts as a registered Digital Asset Service Provider (PSAD), ensuring the proper management and custody of the tokens issued under this offering. For the operational execution of the issuance and administration of the digital assets, BANCO ATLÁNTIDA EL SALVADOR, S.A., acting as a Digital Asset Service Provider (PSAD), has implemented a specialized technological infrastructure that provides the platform for the issuance, trading, and management of the digital assets.
Legal Counsel	BANCO ATLÁNTIDA EL SALVADOR, S.A. 1st Poniente Street and Constitución Boulevard #3538, Escalón Neighborhood, San Salvador. https://www.bancoatlantida.com.sv/ Contact Phone Number: +503 2223-7676 CNAD Registration Number – PSAD-0035.
Digital Asset Certifier	TR Capital, S.A. de C.V. Address: Calle Cuscatlán, #4312, Col. Escalón, San Salvador, El Salvador. Website: https://www.trcapital.net/ CNAD Registration Number: CERT-0003 Designated Contact Person: Héctor Ramón Torres Córdova Contact Phone Number: +503 2538-6360 Contact email: info@trcapital.net
Issue Arranger	BANCO ATLÁNTIDA EL SALVADOR, S.A. 1st Street West and Constitución Boulevard #3538, Escalón Neighborhood, San Salvador. Contact phone number: +503 2223-7676 https://www.bancoatlantida.com.sv/ CNAD Registration Number – PSAD-0035
External Auditor	Auditores y Consultores de Negocios, S.A. de C.V. Calle 1, No. 113, between Calle La Mascota and Calle Loma Linda, Colonia San Benito, San Salvador Centro.

<https://www.bakertilly.com.sv>

Designated Contact Person: Otto Karím Guzmán Barrera

Contact Phone Numbers: +503 2556 0505

Contact email: otto.guzman@bakertilly.com.sv

P. Experience and Roles of Participants in the Issuance of the Token

As part of the ATLÁNTIDA01 token issuance, key stakeholders with experience in the fields of digital assets, *blockchain* technology, and finance have participated, assuming specific roles aimed at strengthening the transparency of the process, as well as contributing to proper risk management and the development of the issuance. APPENDIX V.

I. Issuer: BANCO ATLÁNTIDA EL SALVADOR, S.A.

- **Address:** 1st Poniente Street and Constitución Boulevard #3538, Escalón Neighborhood, San Salvador, ZIP Code 1101.
- **Website:** <https://www.bancoatlantida.com.sv/>
- **Designated contact person:** Carlos Antonio Turcios Melgar
- **Contact phone number:** +503 2223-7676
- **Contact email:** infotoken@bancatlan.sv

Background:

BANCO ATLÁNTIDA EL SALVADOR, S.A., is a member of Inversiones Financieras Atlántida S.A., a subsidiary of Financieras Atlántida, S.A. (INVATLAN), the holding company of the Atlántida Financial Group of Honduras, with a history spanning more than 100 years, an international presence, and steady growth.

The business model of BANCO ATLÁNTIDA EL SALVADOR, S.A., is based on the quality of its services, which meet financial needs in Corporate Banking, SME Banking, and Personal Banking, as well as new structured financial products, all delivered by a professional and expert staff.

Mission

We are dedicated to unlocking each client's potential, transforming ideas into reality with innovative financial solutions that inspire and build a future full of opportunities.

Vision

To be the strategic partner that provides you with timely solutions and innovative, reliable, and highly valued financial experiences to open up a world of opportunities for you.

Specific Functions:

- Issuer of the ATLÁNTIDA01 debt token.
- Responsible for the company's active operations.
- Ensure compliance with the terms established in the offering, ensuring alignment between the interests of the issuer and the investors.
- Prepare and submit the issuance documentation to the CNAD.
- Comply with the regulatory framework for anti-money laundering, anti-fraud, and transparency.
- Conduct its operations with due diligence.

CLARIFICATION: BANCO ATLÁNTIDA EL SALVADOR, S.A. is the sole party liable to tokenholders; liability does not extend to its shareholders, parent companies, affiliates, or related parties, unless expressly agreed upon or required by applicable law.

II. Issue Arranger: BANCO ATLÁNTIDA EL SALVADOR, S.A.

- **Address:** 1st Poniente Street and Constitución Boulevard #3538, Escalón Neighborhood, San Salvador, ZIP Code 1101.
- **Website:** <https://www.bancoatlantida.com.sv/>
- **Registration Number:** CNAD: PSAD-0035
- **Designated Contact Person:** Carlos Antonio Turcios Melgar (Chief Executive Officer)
- **Contact phone number:** +503 2267-4250 and +503 2267-4411
- **Contact email:** infotoken@bancatlan.sv

Experience:

BANCO ATLÁNTIDA EL SALVADOR, S.A., is a financial institution with experience in the structuring and management of digital assets, providing solutions for public offerings of debt securities in investment programs. His experience in banking and corporate finance contributes to strengthening the processes for structuring digital asset issuances, incorporating practices aimed at compliance with the applicable regulatory framework and proper risk management.

Specific Responsibilities:

- Design and structuring of the offering, ensuring alignment with applicable regulations.
- Preparation and review of key documentation, including the Relevant Information Document (RID).
- Overseeing legal and regulatory compliance, in coordination with relevant authorities.

III. Digital Asset Service Provider (PSAD): BANCO ATLÁNTIDA EL SALVADOR, S.A.

- **Address:** 1st Poniente Street and Constitución Boulevard #3538, Colonia Escalón, San Salvador, ZIP Code 1101, El Salvador
- **Website:** <https://www.bancoatlantida.com.sv/>

- **Registration number:** CNAD: PSAD-0035
- **Designated Contact Person:** Carlos Antonio Turcios Melgar (CEO)
- **Contact phone number:** +503 2267-4250 and +503 2267-4411
- **Contact email:** infotoken@bancatlan.sv

Experience:

BANCO ATLÁNTIDA EL SALVADOR, S.A. is a Digital Asset Service Provider (PSAD) specializing in the management of public debt offering platforms and the trading of digital assets using *blockchain* technology. For the operation and execution of the issuance, BANCO ATLÁNTIDA EL SALVADOR, S.A. ensures a robust and efficient infrastructure for token management.

Specific Functions:

- Management of the ATLÁNTIDA01 token and the trading platform.
- Management of the traceability and security of transactions carried out by token holders.
- Automation of revenue distribution through smart contracts developed under the Algorand protocol.
- Ensuring technical and operational security in the management of digital assets.
- Coordinating the collection and submission of documents for authorization of the issuance with the CNAD.

IV. **Digital Asset Certifier:** TR Capital, S.A. de C.V.

- **Address:** Calle Cuscatlán, #4312. Col. Escalón, San Salvador, El Salvador.
- **Website:** <https://www.trcapital.net/>
- **CNAD Registration Number:** CERT-0003
- **Designated Contact Person:** Héctor Ramón Torres Córdova.
- **Contact phone number:** +503 2538-6360
- **Contact email:** info@trcapital.net

Experience:

TR Capital is a leading firm in the certification and structuring of digital asset issuances in El Salvador. It has participated in more than 85% of the issuances approved by the National Commission on Digital Assets (CNAD), in both the public and private sectors. Its extensive portfolio includes the certification of complex programs across various economic sectors, establishing itself as a leader in the digital asset market.

Specific Responsibilities:

- Certification of the issuance of the ATLÁNTIDA01 token, ensuring its compliance with applicable regulations.

- Assessment of the financial viability of the Public Offering of Debt model.
- Validation of the Key Information Document (KID) and the rights of token holders.

V. **Legal Advisor:** BANCO ATLÁNTIDA EL SALVADOR, S.A.

- **Address:** 1st Poniente Street and Constitución Boulevard #3538, Colonia Escalón, San Salvador, ZIP Code 1101.
- **Website:** <https://www.bancoatlantida.com.sv/>
- **Registration Number:** CNAD: PSAD-0035
- **Designated Contact Person:** Carlos Antonio Turcios Melgar (CEO)
- **Contact phone number:** +503 2267-4250 and +503 2267-4411
- **Contact email:** infotoken@bancatlan.sv

Experience:

The legal department of BANCO ATLÁNTIDA EL SALVADOR, S.A. possesses a solid understanding of the regulatory framework governing digital assets in El Salvador, providing specialized advice on regulatory compliance, the legal structure of issuances, and financial contracts.

In its role as Legal Advisor, BANCO ATLÁNTIDA EL SALVADOR, S.A. is limited exclusively to the legal structuring of the issuance of the digital assets described in this Relevant Information Document. Such advice does not constitute, nor should it be construed as, a recommendation, feasibility analysis, or tax, financial, accounting, regulatory, or investment advice for potential investors, as the latter are responsible for obtaining their own independent advice regarding any aspect other than the legal structuring of the issuance.

Specific Functions:

- Oversight of compliance with the legal provisions applicable to the issuance.
- Liaising with regulatory authorities to ensure the registration and approval of the offering.
- Ensuring the legal and regulatory consistency of the offering documentation.

CLARIFICATION: As the legal advisor is an internal member of the Bank, he or she will not act as an independent advisor to investors, and his or her role is limited to the Issuer's internal structuring and documentation.

VI. **External Auditor:** Auditores y Consultores de Negocios, S.A. de C.V.

- **Address:** Calle 1, No. 113, between Calle La Mascota and Calle Loma Linda, Colonia San Benito, San Salvador Centro.
- **Contact Person:** Otto Karim Guzman
- **Phone:** +503 2299-3400
- **Email:** otto.guzman@bakertilly.com.sv

Experience:

Auditores y Consultores de Negocios, S.A. de C.V. is a firm with over 17 years of experience and an international presence, focused on providing high-quality external and tax audit services, tax advisory services, corporate financial advisory services, accounting and business outsourcing, due diligence, and tax diagnostics. Its team of highly trained professionals offers customized solutions that instill confidence in its clients.

Specific Responsibilities:

- Annual audit of the program's financial statements and the management of funds raised.
- Issuance of semi-annual and annual reports to ensure transparency and financial compliance.

VII. Issue Manager: BANCO ATLÁNTIDA EL SALVADOR, S.A.

- **Address:** 1st Poniente Street and Constitución Boulevard #3538, Colonia Escalón, San Salvador, ZIP Code 1101, El Salvador
- **Website:** <https://www.bancoatlantida.com.sv/>
- **Registration number:** CNAD: PSAD-0035
- **Designated contact person:** Carlos Antonio Turcios Melgar (Chief Executive Officer)
- **Contact phone number:** +503 2267-4250 and +503 2267-4411
- **Contact email:** infotoken@bancatlan.sv

BANCO ATLÁNTIDA EL SALVADOR, S.A. has a highly qualified team with expertise in traditional banking, digital assets, and investment and capital management. This track record enables the bank to offer tailored solutions for deposits, investments, and financing, adapting to the needs of each client.

Specific Functions

- **Issue Administration:** Responsible for ensuring strict compliance with the established terms and conditions, applying the highest standards of quality, transparency, ethics, and professionalism.
- **Regulatory Oversight:** Ensuring compliance with the legal, financial, accounting, and compliance provisions applicable to the issuance.
- **Fund Disbursement:** Ensuring that the proceeds from the issuance are used in accordance with the objectives established for the issuance.
- Responsible for ensuring the diligent, transparent, and secure management of funds, with the aim of guaranteeing full compliance with the obligations assumed upon maturity of the offering.
- Report and carry out the redemption process if the minimum placement amount is not reached.

q. Conflict of Interest

Potential conflicts of interest have been identified in connection with the token issuance, arising primarily from the convergence of multiple roles and functions assumed by the institution, including, among others, its capacity as an issuer and as a Digital Asset Service Provider (DASP). In light of the foregoing, the entity has designed, adopted, and implemented a Conflict of Interest Management Policy aimed at ensuring the proper identification, mitigation, and disclosure of such risks, in line with best corporate governance practices and to protect the interests of investors.

I. Conflict of Interest Management

To mitigate any risks associated with such conflicts and ensure investor protection, the Bank has implemented a set of controls, internal policies, and procedures for the segregation of duties, including the following:

- Establishment of internal barriers (“Chinese Walls”) to ensure operational independence between the areas involved in underwriting and in providing services such as PSAD.
- Designation of clearly differentiated teams and responsibilities, avoiding cross-functional involvement in processes that could compromise objectivity or impartiality.
- Oversight by internal compliance and audit committees, which verify that decisions related to token structuring, custody, and any associated activities comply with regulatory frameworks and best practices.
- Continuous risk review, ensuring that any potential conflicts are identified, assessed, and managed in a timely manner.
- Transparency and adequate disclosure to investors, providing clear and comprehensive information that allows them to understand the Bank’s role and the existence of controls designed to safeguard their interests.

Thanks to these measures, it is ensured that the Bank’s involvement in multiple roles does not adversely affect or significantly undermine investors’ interests, thereby preserving the integrity of the issuance and administration process for ATLÁNTIDA01 debt tokens.

II. The Bank’s Multiple Roles and Management of Conflicts of Interest

Banco Atlántida El Salvador, S.A.’s Participation in the Issuance

Banco Atlántida El Salvador, S.A. participates in this digital asset issuance in various capacities, including as Issuer, Digital Asset Service Provider (PSAD), Structurer, Administrator, Custodian, and Legal Advisor.

The Bank’s participation in multiple roles stems from the comprehensive nature of the issuance’s operational, financial, technological, and legal model and is carried out in accordance with the

Digital Asset Issuance Act, its regulations, the Banking Act, applicable prudential regulations, and the Bank's internal policies.

However, the concurrent assumption of these roles may give rise to actual, potential, or apparent conflicts of interest, which are identified, managed, mitigated, and disclosed to investors as described in this Material Information Document.

Principle of Functional Segregation

Banco Atlántida El Salvador, S.A. will apply a principle of functional segregation among the areas, units, officers, systems, and processes responsible for each of the roles it assumes in the issuance, with the objective of:

- Prevent undue interference between functions;
- Mitigate conflicts of interest;
- Ensure the traceability of decisions;
- Ensure transparency toward investors and authorities.

Functional segregation does not imply the creation of separate legal entities, but rather the implementation of distinct internal structures, independent reporting lines, access controls, separate approval processes, and documentary records that clearly identify the responsibilities associated with each role.

In particular:

Decisions specific to the Issuer are made in accordance with the Bank's corporate governance procedures;

- The PSAD's functions are carried out in accordance with specific policies governing operations, digital custody, technology, KYC/AML, and risk management;
- The structuring of the issuance is documented and approved based on technical, financial, and regulatory criteria;
- The administration of the issuance is governed by objective rules previously defined in the DIR and contractual documentation;
- Custody is limited to the custody, administration, and safekeeping of digital assets, wallets, and cryptographic keys, and does not include underlying assets or the loan portfolio; and
- The legal advisory function is performed as internal legal support, without replacing regulatory, certification, or independent oversight functions.

III. Internal Control and Approval Committees and Bodies

Relevant decisions related to the issuance will be subject to review and approval by the appropriate internal bodies, in accordance with the Bank's corporate governance structure and

policies. Notwithstanding their specific internal designations, the following bodies, among others, may be involved:

- **Issuance Committee or Program Committee:** Responsible for coordinating the structuring of the issuance, reviewing regulatory milestones, validating the consistency of the DIR, and overseeing the overall execution of the program.
- **Risk Committee:** Responsible for assessing the financial, operational, technological, legal, regulatory, reputational, digital custody, and business continuity risks associated with the issuance.
- **Compliance Committee:** Responsible for overseeing compliance with KYC, due diligence, ML/TF/PADM prevention, transaction monitoring, sanctions lists, and regulatory reporting.
- **Technology and Information Security Committee:** Responsible for reviewing technological controls, wallet and key custody, cybersecurity, access management, incident management, and business continuity.
- **Legal Committee or Internal Legal Department:** Responsible for the legal review of the DIR, contracts, disclosures, transfer restrictions, and regulatory consistency of the issuance.
- **Board of Directors or Designated Individual:** Responsible for approving the Bank's participation in the issuance, the assumption of multiple roles, and the essential terms of the structure.

IV. Internal Information Barriers

Banco Atlántida El Salvador, S.A. will implement internal information barriers designed to protect confidential information, prevent the misuse of sensitive information, and mitigate conflicts of interest arising from the Bank's multiple roles.

Such barriers may include, among others:

- Access controls for systems and document repositories;
- Differentiated user profiles;
- Segregation of duties among commercial, operational, technology, legal, compliance, and risk departments;
- Traceability of access and modifications;
- Confidentiality agreements;
- Restrictions on the use of information for purposes other than the assigned function.

V. Operational and Technological Controls

The Bank will implement operational and technological controls commensurate with the nature of the issuance, including:

- Role and responsibility matrices;

- Documented approval workflows;
- Dual control for critical operations;
- Transaction records and logs;
- Access controls for wallets and cryptographic keys;
- Continuous monitoring;
- Business continuity plans;
- Incident response protocols; and
- Periodic reviews by internal audit or other control functions.

VI. **Escalation Procedure**

The Bank will have an internal escalation procedure to address situations that may affect the integrity of the issuance, including:

- Conflicts of interest;
- KYC/AML compliance alerts;
- Technology or custody incidents;
- Regulatory observations;
- Significant investor complaints;
- Reputational or material risk events.

Depending on the nature of the event, the matter will be escalated to the Compliance, Risk, Legal, Technology, and Senior Management departments, the relevant committees, or the Board of Directors, without prejudice to applicable regulatory filings.

Express Disclosure to the Investor

The investor acknowledges and agrees that Banco Atlántida El Salvador, S.A. participates in the offering as Issuer, PSAD, Structurer, Administrator, Custodian, and Legal Advisor, which may give rise to actual, potential, or apparent conflicts of interest.

The Bank declares that it will implement measures such as functional segregation, committees, internal controls, information barriers, escalation procedures, and document traceability to mitigate such conflicts. However, the investor acknowledges that these measures do not completely eliminate the risk associated with the concentration of functions.

The Bank's multiple roles do not constitute a guarantee of return, liquidity, repurchase, payment, financial backing, or the absence of risk; investors must evaluate the offering by considering the risk factors described in this DIR.

VII. **No Substitution of Regulatory or Independent Functions**

The Bank's role as structurer, administrator, custodian, or in-house legal advisor does not replace the supervisory, certification, authorization, or control functions that fall to the CNAD, financial authorities, certifiers, auditors, or independent third parties in accordance with applicable regulations.

Given that the Bank participates in this offering in multiple capacities, including as issuer, digital asset service provider (PSAD), structurer, and legal advisor, the potential existence of actual or apparent conflicts of interest arising from the concentration of functions is acknowledged. To mitigate these risks and ensure fair treatment of investors, the Bank has established and implemented a comprehensive internal control framework, which includes, at a minimum, the following measures:

- Functional and organizational segregation. Clear separation of functions, responsibilities, and reporting lines among the areas involved in the issuance, service provision, structuring, and legal advisory services, avoiding undue overlap in decision-making.
- Identification of responsible areas. Express designation of organizational units responsible for each role assumed, with a documented definition of competencies, authorities, and responsibilities, in accordance with approved internal policies.
- Internal approval procedures. Establishment of formal, independent, and tiered approval processes for relevant decisions related to issuance, including validations by control functions (risk, compliance, and, where applicable, internal audit or specialized committees).
- Control and Recording of Decisions. Implementation of mechanisms for documenting, tracing, and archiving decisions made by each role, ensuring sufficient evidence to verify the proper management of potential conflicts of interest.
- Supervision by Internal Audit. Inclusion of the issuance structure and processes within the internal audit plan, with periodic reviews aimed at verifying the effectiveness of controls, adherence to functional segregation, and compliance with the applicable regulatory framework.
- Monitoring of Regulatory Compliance. Involvement of the compliance function in the identification, assessment, and ongoing monitoring of conflicts-of-interest risks, including verification of adherence to the Digital Asset Issuance Act, its secondary regulations, and other applicable regulations.
- Customer Service and Complaint Channels. Availability of formal mechanisms for handling inquiries, complaints, and claims from tokenholders, which operate under principles of impartiality, due diligence, and defined response times.

The Bank declares that the above measures form part of its governance, risk management, and internal control system, and are intended to prevent, identify, manage, and, where appropriate, adequately mitigate conflicts of interest that may arise in the context of this issuance.

Likewise, the protocol for the prevention, detection, management, and communication of conflicts of interest may be reviewed; its purpose is to establish a regulatory and operational framework that enables the identification, prevention, management, and communication of conflicts of interest that may arise in the course of the activities of BANCO ATLÁNTIDA EL SALVADOR, S.A.

This document seeks to ensure transparency, impartiality, and regulatory compliance in all decisions and operations, in alignment with the applicable provisions of the regulatory framework for digital assets. **See Annex VII. Issuer's Policies.**



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3. GLOSSARY

This glossary has been developed to provide a general understanding of the terms used in the context of the public offering of ATLÁNTIDA01 digital assets. These definitions are not intended to serve as legal advice. For specific guidance or advice, it is recommended that you consult a qualified financial advisor.

- **Digital Asset:** A digital representation of an asset that can be stored and transferred electronically using distributed ledger technology or blockchain.
- **Token:** A digital representation of economic rights. In this case, ATLÁNTIDA01 is a debt token representing rights to principal and interest.
- **Debt Token:** A type of digital asset that grants its holder rights under a contract obligating the issuer to pay principal and interest.
- **Smart Contract:** A program that executes automatically when predefined conditions are met, ensuring transparency and security in blockchain transactions.
- **Digital Asset Service Providers (DASPs):** Entities authorized to provide services related to digital assets, such as custody and trading.
- **KYC (Know Your Customer):** A process for identifying and verifying customers, essential for preventing fraud and money laundering.
- **External Auditor:** An independent entity that reviews and verifies a program's internal controls and financial statements.
- **Secondary Market:** A market in which digital assets are traded a second or subsequent time by purchasers or their representatives without the issuer's involvement, but within the Banco Atlantida El Salvador, S.A. platform.
- **Custodian:** A financial institution responsible for the custody, administration, and safekeeping of digital assets or wallets.
- **Decentralized Ledger:** An immutable record of transactions distributed across a blockchain network, without centralized intermediaries.
- **Token Valuation:** The calculation of a token's market value based on economic variables and underlying performance.
- **National Commission on Digital Assets (CNAD):** Regulatory authority in El Salvador that oversees the issuance and management of digital assets.
- **Public Offering of Digital Assets:** A technical or commercial proposal to offer digital assets to the public for sale.

The definitions contained in this glossary are specific and apply solely to this Key Information Document (KID) related to the issuance of ATLÁNTIDA01 tokens. These definitions should not be interpreted as applying outside the context of this document or to other programs, issuances, or legal purposes.

4. ISSUEER'S COVER LETTER

Dear Investor,

On behalf of **Banco Atlántida El Salvador, S.A.** (hereinafter, “Banco Atlántida,” “the Bank,” or “the Issuer”), we are pleased to present you with an innovative investment opportunity consisting of a **Tranche-Based Tokenized Debt Issuance Program**, designed to finance the Bank’s active operations, support funding matching, liquidity management, and other legally permitted banking purposes, through the use of digital assets issued and managed in accordance with the applicable regulatory framework.

Banco Atlántida El Salvador, S.A. is part of one of the most solid and recognized financial groups in the Central American region. With more than a century of experience, Grupo Financiero Atlántida has built a solid reputation based on customer trust, financial innovation, and excellence in service delivery. In El Salvador, Banco Atlántida offers comprehensive financial solutions for retail, corporate, and SME banking segments, distinguished by its personalized, high-quality service.

Banco Atlántida El Salvador is a member of **Inversiones Financieras Atlántida, S.A.**, a subsidiary of **Inversiones Atlántida, S.A. (INVATLAN)**, the holding company of **Grupo Financiero Atlántida de Honduras**—a conglomerate with over 100 years of experience and a regional presence in Central America and Belize.

The Atlántida Financial Group maintains a broad diversification of businesses across the banking, insurance, pensions, investment management, financial leasing, warehousing, and credit sectors. Likewise, **Banco Atlántida de Honduras**, founded in 1913, is positioned as one of the country’s leading financial institutions, with a significant market share and a strong presence in the corporate segment.

In El Salvador, Grupo Financiero Atlántida operates a comprehensive ecosystem of financial services comprising **Banco Atlántida El Salvador, S.A.**; **Atlántida Securities Casa Corredora de Bolsa, S.A. de C.V.**; **Seguros Atlántida, S.A.**; **Atlántida Vida, S.A.**; **Atlántida Capital, S.A.**; **AFP Confía**; **Atlántida Titularizadora, S.A.**; and **Leasing Atlántida, S.A.**, thereby strengthening its ability to comprehensively address the financial and wealth management needs of its clients. This offering aims to provide investors with the opportunity to participate, through debt tokens, in the financing of active operations, with an approach that takes into account criteria of sustainability, economic development, and social impact.

Our group’s experience in the financial sector has enabled us to move toward more efficient funding models, incorporating the Public Offering of Debt Tokens as part of our growth strategy. In line with our goal of offering a comprehensive range of financial products and services, and as a regulated entity that incorporates cutting-edge technologies— —this offering has been structured to support the placement and management of the Bank’s active operations.

The tokens allow investors to participate in the financing of these operations, as well as in funding matching and liquidity management, among other permitted purposes, in exchange for a return that will be subject to market conditions, the institution's operational needs, and the specific terms of each placement tranche.

The debt program for this issuance provides for a maximum amount of up to USD \$300,000,000.00 (three hundred million United States dollars), with a maximum term of up to 120 months, and constitutes an investment alternative that combines potential financial returns with characteristics such as operational efficiency, transparency, and traceability associated with blockchain technology.

Key aspects of the offering:

- **Return Profile:** The Debt Tokens represent obligations in favor of their holders and their participation in an unsecured collective loan issued by the Issuer. This may be of interest to investors seeking alternatives for capital returns with a risk profile aligned with their objectives.
- **Transparency and record-keeping:** The use of blockchain technology enables verifiable, traceable records with mechanisms that make them difficult to alter.
- **Access and liquidity:** The tokens may be traded on authorized secondary markets beginning with the initial offering, subject to applicable regulations and market conditions.
- **Strategic Approach:** This contributes to strengthening the financial system through the adoption of innovative funding mechanisms.

BANCO ATLÁNTIDA EL SALVADOR, S.A., reaffirms its commitment to operating in accordance with standards of ethics, integrity, and responsibility, striving to align its initiatives with the development of high-quality financial solutions supported by innovation.

We invite you to review in detail the information contained in the Relevant Information Document (DIR), where you will find key elements to conduct your own analysis. This issuance could be an alternative to consider for diversifying your portfolio, in line with current financial market trends.

Sincerely,

Carlos Antonio Turcios Melgar
Chief Executive Officer
BANCO ATLÁNTIDA EL SALVADOR, S.A.

5. AFFIDAVIT

To the best of our knowledge and belief, and based on the information available to date, the information contained in the Relevant Information Document for the Offering submitted to the National Commission on Digital Assets is correct, accurate, and complete, and contains no material omissions. BANCO ATLÁNTIDA EL SALVADOR, S.A. will keep all information up to date and, in the event of any material change in the information provided or in circumstances affecting the token offering, will promptly disclose such information to investors and the competent authorities, as required by applicable laws and regulations. **Annex I - Affidavit.**

6. CERTIFIER'S REPORT

TR Capital, S.A. de C.V., is a company authorized by the CNAD as a Digital Asset Certifier under registration number CERT-0003. It is a Salvadoran company, incorporated on May 13, 2017, before the notary public office of Alfredo Alejandro Muñoz Rodas, Esq. It is registered in the Companies Registry of the Commercial Registry under number 21 of Book 3776; with registration number 2017088178; and Tax Identification Number 0614-130517-102-0.

Attached to this Material Information Document is the Certifier's full report, along with all of its considerations regarding the issuance of the ATLÁNTIDA01 token. **Annex II—Certifier's Report.**

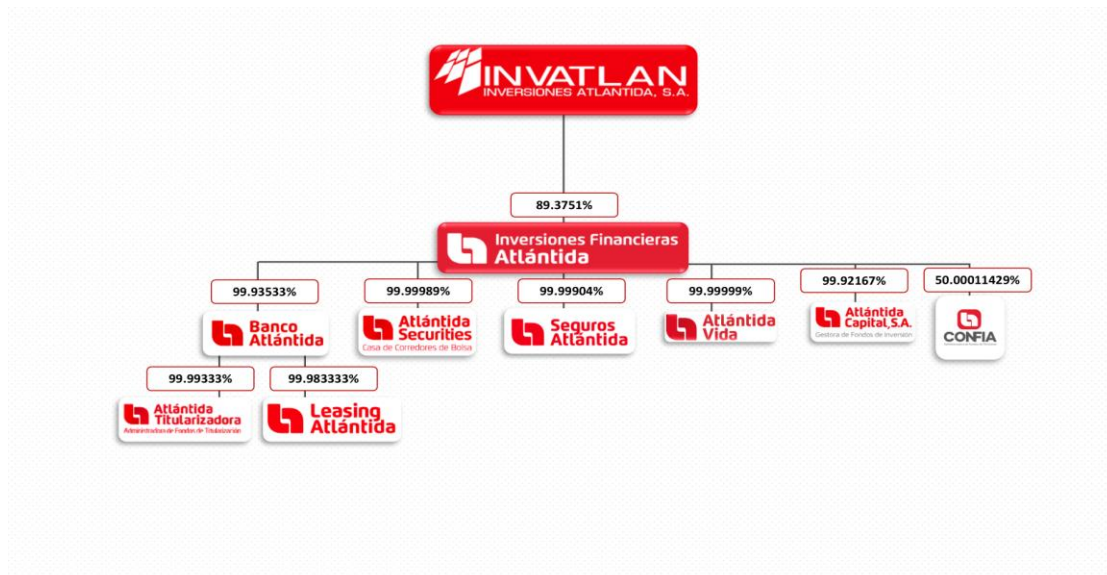
7. DESCRIPTION OF THE ISSUER

A. Corporate Profile

BANCO ATLÁNTIDA EL SALVADOR, S.A. is the entity responsible for offering financial products and services related to its active operations, enabling its customers to access financing structured according to their needs, without requiring significant initial outlays. The bank will maintain a diversified portfolio of credit products, targeting various economic sectors, with the goal of comprehensively meeting the financial needs of its customers.

Banco Atlántida El Salvador is a member of **Inversiones Financieras Atlántida, S.A.**, a subsidiary of **Inversiones Atlántida, S.A. (INVATLAN)**, the holding company of the **Atlántida Financial Group of Honduras**, a conglomerate with more than 100 years of experience and a regional presence in Central America and Belize. The Atlántida Financial Group maintains a broad diversification of businesses across the banking, insurance, pensions, investment management, financial leasing, warehousing, and credit sectors. Likewise, Banco Atlántida de Honduras, founded in 1913, ranks among the country's leading financial institutions, with a significant market share and a strong presence in the corporate segment.

In El Salvador, Grupo Financiero Atlántida offers a comprehensive ecosystem of financial services comprising **Banco Atlántida El Salvador, S.A.**; **Atlántida Securities Casa Corredora de Bolsa, S.A. de C.V.**; **Seguros Atlántida, S.A.**; **Atlántida Vida, S.A.**; **Atlántida Capital, S.A.**; **AFP Confía**; **Atlántida Titularizadora, S.A.**; and **Leasing Atlántida, S.A.**, thereby strengthening its ability to comprehensively address the financial and wealth management needs of its customers. Below is a list of the companies that make up the Financial Group;



Through the loan agreements entered into with the bank, customers will make periodic payments that include principal repayment and payment of the agreed-upon interest, in accordance with the established terms and conditions, contributing to a clear, predictable financial relationship aligned with best banking practices.

B. Vision and Purpose

BANCO ATLÁNTIDA EL SALVADOR, S.A. seeks to transform access to financing through innovative financial solutions geared toward its lending operations, optimizing its funding sources through the use of digital assets. The bank's purpose is to offer its customers and strategic partners flexible, transparent, and efficient financing alternatives, helping to reduce barriers to credit access and strengthen financial inclusion.

Current Situation and Financial Strategy

Issuer	BANCO ATLÁNTIDA EL SALVADOR, SOCIEDAD ANÓNIMA
Trade Name	BANCO ATLÁNTIDA EL SALVADOR, S.A.
Tax Identification Number	0614-170395-107-9
Address	1 Calle Poniente, Blvd. Constitución, Colonia Escalón, #3510, District of San Salvador, Municipality of San Salvador, Department of San Salvador.
Legal Representative	Carlos Antonio Turcios Melgar
Phone	+503 22237676
Email	infotoken@bancatlan.sv
Website	https://bancoatlantida.com.sv

C. Organizational Chart

Corporate Structure at the Time of Issuance:



D. Description of the Management Team and Its Functions:

The corporate governance of **BANCO ATLÁNTIDA EL SALVADOR, S.A.** is structured across several levels of management, each of which plays a fundamental role in decision-making and the achievement of strategic objectives. The profiles of the members of the Board of Directors and their respective roles are detailed below.

General Shareholders' Meeting

The General Shareholders' Meeting is the governing body. Its main functions include approving financial statements, electing members of the Board of Directors, and defining long-term corporate strategies.

The corporate governance structure of **BANCO ATLÁNTIDA EL SALVADOR, S.A.**, is designed to facilitate informed and timely decision-making processes, in line with recognized practices in the financial sector, thereby contributing to greater transparency, sound comprehensive risk management, and institutional sustainability.

The Board of Directors of **BANCO ATLÁNTIDA EL SALVADOR, S.A.** is composed of the following members:

- **Chairman of the Board: Arturo Herman Medrano Castañeda**
A graduate of the National Autonomous University of Honduras, he is an attorney and notary public with a Master of Laws from Tulane University. As part of his professional experience, he has served as director of various companies within the Atlántida Financial Group in Honduras, including Seguros Atlántida, BANCO ATLÁNTIDA, and AFP Atlántida.
- **Vice President: Guillermo Bueso Anduray**

A graduate of the National Autonomous University of Honduras with a Bachelor's degree in Legal and Social Sciences, he holds a Master's degree in Development Banking from the Finafrica Institute and a Master's degree in Business Administration from the Owen School of Management. He has extensive experience in executive positions within the financial system throughout Central America.

- **Secretary: Franco Edmundo Jovel Carrillo**

A graduate of José Matías Delgado University with a Bachelor's degree in Legal Sciences, he has extensive experience in securities, banking, insurance, and commercial law, among other areas. He served as General Counsel for Banco Agrícola and Banco HSBC Salvadoreño (now Davivienda), as well as an associate consultant for Coinfin, among other executive positions. He is also legal counsel for Corporación de Inversiones Atlántida and Inversiones Atlántida. He has extensive experience in human resources and executive roles within the financial sector.

- **Director: Maria Jose Aguero Lara**

Professional with a Bachelor's Degree in Finance
Throughout her professional career, she has served as Manager of International Organizations and Special Programs, Deputy Vice President of International Business, and currently as Vice President of International Business at Banco Atlántida (Honduras).

- **Alternate Director: Manuel Santos Alvarado Flores**

He holds a Bachelor's degree in Business Administration and a certificate in Financial Management and Decision-Making. Throughout his professional career, he has served as Manager of Specialized Operations, Vice President of Operations, and currently as Vice President of Central Operations at Banco Atlántida in Honduras.

- **Alternate Director: Manuel Enrique Dávila Lázarus**

He holds a Bachelor's degree in Business Administration and a Master's degree in Business Administration. His professional experience includes serving as Executive Director of ACCIVAL, Corporate Chief Financial Officer at Grupo Intur, Regional Vice President of Corporate Banking, and subsequently Executive Vice President of Corporate Banking at BANCO ATLÁNTIDA S.A.—all Honduran companies.

- **Alternate Director: Enrique Antonio García Dubón**

He holds a Bachelor's degree in Economics from José Simeón Cañas University (UCA) and a Master's degree in Banking and Finance from Texas State University. He has served as a financial services consultant for SIECA, supporting the strengthening of the securities market in Central America for the IDB and BOLCEN, as well as the development of the insurance market at the Ministry of Economy of El Salvador, and providing an analysis of banking reforms in Central America for UNDP/Geneva. He has experience in both executive positions

within the financial system.

- **Alternate Director: Francisco Rodolfo Bertrand Galindo**

A lawyer and notary public, he holds a master's degree in economics with a specialization in finance and international trade, as well as a postgraduate degree in international banking. He has an extensive career and experience in various fields. He has served as Minister of the Interior and Secretary of Legislative and Legal Affairs, among other positions. He is also a partner at the law firm Bertrand Pineda & Associates.

Functions of the General Shareholders' Meeting:

- ✓ Approval of the Board of Directors' Annual Report
- ✓ Approval of the financial statements, including the balance sheet, income statement, and statement of changes in equity
- ✓ Approval of the External Auditor's Report
- ✓ Appointment and removal of directors, the External Auditor, and the Tax Auditor
- ✓ Setting the compensation for directors, the External Auditor, and the Tax Auditor
- ✓ Approval of the allocation of net income
- ✓ All matters brought before the Board of Directors that are not required by law to be submitted to the Extraordinary General Meeting.

E. PERSONS HOLDING THE POSITIONS LISTED IN THE ORGANIZATIONAL CHART

Carlos Antonio Turcios Melgar: Chief Executive Officer and Legal Representative

He holds a Bachelor's degree in Economics and Business from the Escuela Superior de Economía y Negocios (ESEN) and a Master's degree in Business Administration from the INCAE Business School. He has an extensive background and experience in investments, banking, and finance.

His duties include:

- a) Representing the Company in extrajudicial matters and signing on behalf of the Company;
- b) Entering into all types of agreements and contracts and assuming all types of obligations;
- c) Opening and closing all types of bank accounts and any kind of deposits;
- d) Drawing, depositing, and withdrawing funds from such accounts; accepting, discounting, rediscounting, and guaranteeing bills of exchange, promissory notes, and other commercial instruments of obligation in favor of or at the expense of the Company;
- e) Granting and conferring all types of administrative, judicial, special, or general powers of attorney, and revoking them;
- f) Authorize or acquire real property, personal property, securities, or rights in favor of the Company;
- g) To sell, mortgage, encumber, dispose of, or lease in any form the Company's real or

- personal property or rights therein, in accordance with the law and subject to prior authorization by the Board of Directors;
- h) Obtain, on behalf of the Company, all types of loans, subject to prior authorization by the Board of Directors;
 - i) Guarantee and secure all types of obligations up to an amount equivalent to the Company's net worth;
 - j) Carry out all activities consistent with the Company's exclusive purpose;
 - k) To generally represent the company before the Superintendency of the Financial System, the Central Reserve Bank, and all agencies, offices, autonomous and semi-autonomous bodies, General Directorates, Ministries, and Secretariats of State where it is necessary to represent the company administratively in order to obtain the means, mechanisms, and authorizations or permits essential for the smooth operation and development of the company's activities;
 - l) To file with the General Directorate of Internal Revenue any type of petition or documentation related to income tax, wealth tax, transfer tax on movable property, and services tax, as well as any other matters within the purview of said General Directorate;
 - m) Conduct administrative proceedings before any government authority or entity, including the authority to file any written documents, receive notifications, and file appeals as expressly and specifically provided by law;
 - n) Participate in public bidding processes, with the authority to submit or manage proposals.

Marco David Platero Paniagua: Deputy Vice President of Compliance

A graduate of Dr. José Matías Delgado University with a Bachelor's Degree in Legal Sciences, he is an attorney and notary public with extensive experience in anti-money laundering and asset prevention within the financial system, including the banking, securities, and insurance sectors, among others, having served as a Compliance Officer at various companies.

Marco Tulio Ruiz Torres: Vice President of Business

Marco Tulio Ruiz Torres is a financial sector executive with more than 25 years of experience in corporate banking, personal banking, payment systems, commercial management, operations, and business development, having held managerial and senior executive positions in regional and local financial groups. His profile demonstrates sustained experience in regional leadership, management of significant portfolios, commercial expansion, and participation in credit and fiduciary committees.

José Ricardo Estrada: Vice President of Operations and Technology

José Ricardo Estrada has a long-standing professional career with BANCO ATLÁNTIDA EL SALVADOR, S.A., having been employed there from 1997 to the date of this resume, which demonstrates continuity, internal growth, and career development within the same regional financial institution. His professional background includes a Master of Business Administration

with a concentration in Finance and a Bachelor's degree in Industrial Business Administration, which supports an executive profile with a foundation in administration and finance.

Carlos Eduardo Rosales Castro: Deputy Vice President of Risk

Marco Tulio Ruíz Torres has a career spanning more than 25 years in the financial sector, with relevant experience in corporate banking, retail banking, payment systems, business development, regional management, operations, budgeting, and commercial strategy.

He is noted for his strong specialization in comprehensive risk management, quantitative analysis, regulatory compliance, credit risk, liquidity, operational risk, and corporate governance, with direct experience in the Salvadoran banking sector and participation in strategic committees

Monica M. Tamacas: Assistant Vice President of Human Resources and Administration

Monica M. Tamacas holds a bachelor's degree in psychology and a master's degree in human resources management, with a career focused on strategic talent management, compensation, workplace climate, organizational development, labor compliance, and regional human resources administration.

She has a proven track record in strategic and regional human resources, with experience in labor compliance, organizational development, compensation, training, workplace climate, and talent process transformation.

Kelvin Salvador Mejía Cortez: Assistant Vice President of Finance and Treasury

Kelvin Salvador Mejía Cortez is a financial executive with more than 19 years of experience, gained primarily at AFP Confía, specializing in investments, risk, treasury, liquidity, institutional portfolios, ALM, market risk, and corporate governance. His profile reflects sustained experience in highly regulated environments, with an emphasis on control, financial discipline, metrics, and data-driven decision-making.

He has a focused and consistent track record in risk management, institutional investments, treasury, and control within the pension system, with a clear path of internal advancement and technical leadership at AFP Confía.

Franco Jovel: Vice President of Legal Affairs

Franco Edmundo Jovel Carrillo has a broad, senior, and highly specialized career in the legal, banking, securities, insurance, pension, and regulatory fields, with extensive experience in corporate counsel, corporate governance, legal risk management, regulatory compliance, regulatory reforms, and representation before authorities. His professional profile highlights a deep mastery of corporate law and best practices in corporate governance, along with significant participation in legislative initiatives and collegiate bodies. This demonstrates a more extensive, cross-functional, and high-profile career focused on financial legal counsel, regulation, corporate governance, compliance, legal reforms, and institutional representation,

with experience in banking, the stock market, regulation, and pensions, as well as participation in key entities within the Salvadoran financial system.

F. Financial Statements

Annex III presents the Financial Statements. The information presented complies with the full version of the International Financial Reporting Standards (IFRS) issued by the International Accounting Standards Committee (IASC), in accordance with the provisions established by the Supervisory Council of the Public Accounting and Auditing Profession.

To provide investors with further insight, the audited financial statements for the years 2023, 2024, and 2025 are included as appendices, as well as the financial statements of Banco Atlántida El Salvador, S.A. as of March 2026.

G. Reason for the Public Offering and Purpose of the Issuance

BANCO ATLÁNTIDA EL SALVADOR, S.A., has chosen to issue digital assets as a mechanism to finance its operations, with the goal of positioning itself at the forefront of modern financial trends. This innovative model allows the bank to capitalize on the advantages of the Public Offering of Debt over traditional financing methods, highlighting its flexibility, accessibility, and efficiency.

The Public Debt Offering provides significant benefits:

- Democratization of investment: The issuance of tokens allows for the participation of a broader group of investors.
- Reduced costs and time: By leveraging blockchain technology, unnecessary administrative and legal processes are eliminated, accelerating program execution and reducing associated costs. This improves profitability for both investors and the issuer.
- Transparency and Traceability: Blockchain technology provides an immutable record of all transactions, ensuring trust and transparency throughout the program's lifecycle.
- Favorable Regulatory Environment: El Salvador's regulatory framework, such as the Digital Asset Issuance Law (LEAD), helps reduce financing costs and encourages foreign investment, positioning the country as a leader in the implementation of innovative digital business models.

H. Conflicts of Interest

To ensure transparency and integrity in our operations, we declare that:

- No conflicts of interest have been identified among the members of our governing bodies, partners, or employees with respect to the members of the National Commission on Digital Assets (CNAD), as well as with other participants in the issuance—including the issuer's certifier—in connection with the token issuance.

- No transactions have taken place between related parties that could compromise the impartiality of our activities.
- Potential conflicts of interest have been identified in connection with the token issuance, arising primarily from the convergence of multiple roles and functions assumed by the institution, including, among others, its capacity as an issuer and as a Digital Asset Service Provider (PSAD). In light of the foregoing, the entity has designed a Conflict of Interest Management Policy aimed at ensuring the proper identification, mitigation, and disclosure of such risks, in line with best corporate governance practices and to protect the interests of investors.

I. Inquiries:

- It is expressly clarified that payment obligations rest solely with BANCO ATLÁNTIDA EL SALVADOR, S.A., and do not extend to shareholders, parent companies, affiliates, or related entities, unless expressly agreed upon.
- The tokens do not constitute bank deposits, savings accounts, checking accounts, or certificates of deposit, and are not covered by deposit insurance or equivalent mechanisms.
- In the event of intervention, resolution, liquidation, revocation of authorization, suspension of operations, or any other administrative, regulatory, or judicial measure affecting the Issuer, the economic rights derived from the ATLÁNTIDA01 tokens shall be subject to the legal regime applicable to banking institutions, including the order of priority of claims, restrictions, procedures, and effects determined by the competent authority.
- The issuance is not backed by any specific, real, fiduciary, and/or pledge guarantees; it will be backed by the Issuer's general assets and the contractual payment obligation assumed by the Bank. Therefore, the obligations arising from ATLÁNTIDA01 will be unsecured, and, unless otherwise required by law or in the case of debt with specific priority, they will be settled on an equal footing with the Bank's other unsecured common obligations.

BANCO ATLÁNTIDA EL SALVADOR, S.A. reaffirms its commitment to ethics and transparency, ensuring that this issuance is conducted in accordance with standards of integrity and sound financial practices.

8. KEY FEATURES OF THE PUBLIC OFFERING

Key features of the ATLÁNTIDA01 issuance	
Type of Public Offering of Digital Assets	Public Debt Offering
Issuer	Banco Atlántida El Salvador
Issuer No.	EAD-0053
Type of Digital Asset	Debt Token
Token Name	ATLÁNTIDA01
Token Ticker Symbol	ATLÁNTIDA01
Issuance Registration No.	AD-00260
Total Issue Amount	The maximum amount of the issuance is USD \$300,000,000.00 (THREE HUNDRED MILLION UNITED STATES DOLLARS), during the authorization period, which is up to 10 years. BANCO ATLÁNTIDA EL SALVADOR, S.A., in its capacity as issuer, may conduct multiple offerings in tranches. All tranches of the offering will be identified under the general designation ATLÁNTIDA01. Notwithstanding the foregoing, each tranche will have a specific and consecutive identification number, in accordance with its order of placement, using the designation ATLÁNTIDA01 – Tranche 1, ATLÁNTIDA01 – Tranche 2, ATLÁNTIDA01 – Tranche 3, and so on. Under no circumstances may the total sum of the face value of the Debt Tokens issued exceed the duly authorized maximum amount. The total amount of the issuance was strategically determined by considering the Bank's funding needs, the expected volume of active transactions, liquidity requirements, maturity and rate matching management, as well as its capital and regulatory capacity to assume the obligations arising from this issuance.

Underlying Assets

The underlying asset of the ATLÁNTIDA01 debt tokens consists of a tokenized debt program divided into tranches, up to a maximum amount of USD \$300,000,000.00, representing direct, general, and unconditional payment obligations of BANCO ATLÁNTIDA EL SALVADOR, S.A., in its capacity as Issuer, in favor of the holders of such tokens, in accordance with the terms and conditions set forth in this Material Information Document and in the specific terms of each tranche.

The issuance will be documented by a Master Debt Acknowledgment Agreement, which will constitute the legal instrument through which the Issuer will formally acknowledge its obligation to pay principal, interest, amortizations, redemptions, or reimbursements owed to the holders of the ATLÁNTIDA01 tokens.

The Master Debt Acknowledgment Agreement must be executed within a maximum period of thirty (30) business days from the date the issuance is authorized by the National Commission on Digital Assets (CNAD).

The issuance program will be non-revolving; consequently, payments, amortizations, redemptions, or maturities of the issued tokens will neither restore nor increase the availability of the maximum authorized amount.

Token Guarantees

The issuance of the debt tokens (ATLÁNTIDA01) is not backed by any specific, real, personal, fiduciary, and/or pledge-based guarantee; it is backed by the Bank's general assets; investors are unsecured creditors, and their enforceability derives directly from the contractual relationship in accordance with the provisions of the Framework Agreement for the Recognition of Debt.

Furthermore, this unsecured nature means that, in the event of the issuer's default or liquidation, investors/tokenholders will participate and act individually and on an equal footing with other unsecured creditors, in accordance with the applicable rules of priority of claims, thereby assuming the general credit risk associated with the issuing institution. In the event of intervention, resolution, liquidation, revocation of authorization, or any other measure applicable to the bank, the rights of tokenholders will be subject to the legal order of priority applicable to unsecured creditors.

For the sake of regulatory clarity, it is expressly stated that the Debt Recognition Framework Agreement does not constitute a guarantee in favor of investors, but rather the legal mechanism through which the underlying credit obligation in favor of the token holders is formalized,

documented, and made enforceable.

Each token will have a face value of USD 1.00 and will be issued with zero decimal places; therefore, there will be no fractional tokens, and all acquisitions, transfers, or redemptions must be made in whole units.

Token Unit

The debt tokens to be issued constitute negotiable obligations in favor of their respective holders and represent their individual participation in a collective unsecured credit facility owed by the Issuer. Each token confers a credit right against the Issuer, in proportion to the participation acquired in the respective tranche, without granting any equity, political, corporate, asset ownership, or management rights over the Bank.

Investors who purchase ATLÁNTIDA01 debt tokens will be entitled to receive payment of principal and interest on the outstanding balance of the tokens during the term of the issuance, in accordance with the terms defined for each tranche. However, the Issuer may make partial payments of principal and/or interest in accordance with the Offering Circular for each Tranche and applicable documents.

**Minimum and Maximum
Trading Amounts**

Minimum Purchase Amount per Investor.

The minimum purchase amount for the ATLÁNTIDA01 token offering is USD \$1,000.00 (ONE THOUSAND UNITED STATES DOLLARS), equivalent to the purchase of one thousand tokens.

Minimum Placement Amount for the Validity of the Offering.

The minimum placement amount required to validate the validity of the offering is USD \$500,000.00 (FIVE HUNDRED THOUSAND UNITED STATES DOLLARS).

The issuer will have a maximum period of six (6) months to reach this minimum initial placement amount. If this amount is not reached within the established period, a refund mechanism will be activated to guarantee investors a full refund of their invested capital.

This process will be managed through the trading platform used for the offering, ensuring transparency and efficiency at every stage.

Investors participating in this Public Offering will be entitled to recover their investment if the minimum placement amount of USD \$500,000.00 is not reached by the end of the defined period, or in the event of cancellation of the offering, in accordance with the mechanism detailed below:

Refund Process.

If, at the end of the six (6)-month placement period for the Offering, the minimum initial placement amount of USD \$500,000.00 (FIVE HUNDRED THOUSAND UNITED STATES DOLLARS), the offering will not take effect, and the principal contributed by investors will be refunded in full, in accordance with the terms and conditions set forth in this Material Information Document (MID) and in the documentation for the applicable tranche.

This mechanism ensures that the issuance program will only proceed if the defined minimum level is met. Funds received during the placement process will be tracked through internal accounts and records.

It is important to note that the refund will not include returns or interest, since the issuance will not have become effective.

To enhance the transparency, traceability, and security of the process, the Digital Asset Service Provider (PSAD) will be responsible for managing

the refund of funds.

The refund procedure will be carried out in accordance with the following steps:

1. Verification of Compliance with the Placement Condition:

- Upon expiration of the established period, verification will be conducted to determine whether the minimum amount required for the public offering to continue has been reached.
- If this condition is not met, the procedure for returning funds to token holders will be initiated in accordance with established internal controls and procedures.

2. Notification to Token Holders:

- Token holders will be informed, through the designated communication channels, of the failure to meet the minimum placement amount.
- The notification will include the procedure for refunding funds, the applicable deadlines, and any relevant information for investors.

Such notification will be provided within 5 business days following the expiration of the placement period.

3. Refund Process:

- The Issuer will proceed to refund one hundred percent (100%) of the capital contributed by each token holder.
- No returns or distributions will be recognized, as the issuance will not have met the necessary conditions to begin generating returns.
- The refund will be made within a maximum of fifteen (15) business days from the date of notification to the tokenholders.

4. Confirmation of the Refund:

- Prior to processing the refunds, the necessary internal reconciliations and validations will be conducted to ensure the accuracy of the amounts to be refunded.
 - Tokenholders will be notified of the completion of the refund process through the communication channels established for the token issuance.
 - Documentary evidence and records will be maintained to verify the
-

amounts refunded, the payment dates, and the transactions carried out as part of the refund process.

5. Guarantee of Transparency:

- The entire refund process will be recorded on the *blockchain* platform used for the issuance, providing an immutable record that reinforces investor confidence.
- Compliance reports certifying the completion of the process may be issued.

With this structure, BANCO ATLÁNTIDA EL SALVADOR, S.A. strengthens investor confidence by offering a capital protection mechanism, ensuring financial viability and compliance with the conditions established in the offering.

Regarding the custody of funds from the sale of tokens, all proceeds from the offering until the minimum initial offering amount is reached may not be used by the issuer. Once the minimum initial offering amount is reached, the funds may be made available to the Treasury Department.

Notice Regarding Placement Tranches of the Offering

Within the term of the Offering, the Issuer may conduct successive token placements structured into different tranches, each with terms and interest rates defined at the time of placement, based on market conditions and the amount of tokens available, as determined by the Issuer. The specific terms of each tranche will be reported in advance to the CNAD, in accordance with the procedures established by the Commission, and will be disclosed to the investing public through the respective public offering notices.

For each tranche of the offering, the Issuer must specify in the corresponding public offering notice, at a minimum, the placement date, tranche number, maturity date, interest rate, payment frequency, trading platform, and early redemption terms.

No tranche may exceed the maximum authorized term of the issuance or have a maturity date later than the maximum term of 120 months.

**Rights of the Token
Holder**

Token holders shall enjoy the following rights:

Return of the face value and an interest rate:

The issuer will pay interest on each holder's token balance during the term of the issuance, calculated on a calendar-year basis.

The tokens may be issued at par value, accruing a fixed or variable interest rate established by the issuer at the time of each offering. Both principal and interest may be paid monthly, quarterly, semiannually, annually, or upon maturity, as determined prior to the offering of each tranche. When the placement is at par value and accrues interest, interest will be paid periodically—either at a fixed or variable rate—with different principal repayment schedules.

If the rate is variable, it may be a step-up interest rate, a step-down interest rate, or a variable rate based on a base rate, which may be: (i) the Weighted Average Basic Lending Rate (TIBP); or the Secured Overnight Financing Rate (SOFR) or Term SOFR, which is the forward-looking term rate based on SOFR. If the variable transaction rate is determined using the TIBP as the base rate, the Weighted Average Basic Deposit Rate for 30-, 90-, or 180-day time deposits in the Financial System, as published by the Central Reserve Bank of El Salvador during the week prior to the transaction, shall be used. A surcharge will be added to this base rate, which will remain fixed throughout the term of the issue. This surcharge may not be less than zero point ten percent (0.10%) per annum and must be established prior to the issuance. If the variable rate for the transaction is determined using SOFR, the rate published by the CME Group (or its successor designated by the Relevant Government Agency) on its website or on platforms that publish said index for the 30-, 90-, or 180-day terms shall be used. The applicable rate shall be the one published on the Wednesday of the week preceding the transaction. A surcharge will be added to this base rate, which will remain fixed throughout the term of the placement. Said surcharge may not be less than zero point ten percent (0.10%) per annum and must be established prior to the negotiation of the placement. The interest rate may be fixed or variable at the issuer's discretion and will be determined prior to each transaction, remaining in effect for the term of each placement and must be published in the official media. BANCO ATLÁNTIDA EL SALVADOR, S.A. may establish, prior to the placement, a minimum rate and a maximum rate to be paid during the term of the issue. If the sum of the base rate plus the fixed surcharge is equal to or greater than the minimum rate but does not exceed the maximum rate, the resulting rate will be paid. If the sum of the base rate plus the fixed surcharge is less than the minimum rate, the

established minimum rate will be paid. Conversely, if that sum exceeds the maximum rate, the maximum rate defined will be paid to the Tokenholder. If the interest rate is variable, it will be adjusted monthly, quarterly, or semiannually under the same conditions specified for the initial determination of the interest rate. Interest rate adjustments must be communicated to the Tokenholders via an official notice.

Purchasers acknowledge and agree that the Bank will not act as an independent representative of the Tokenholders, nor will it assume fiduciary duties, duties of collective representation, common defense, management of joint interests, or act on behalf of the purchasers, except for those obligations expressly assumed in the issuance documentation or imposed by applicable regulations.

Tokenholders shall exercise the rights arising from the digital assets individually, autonomously, and directly, in accordance with the terms of issuance, the Digital Asset Issuance Act, and other applicable regulations. Any form of joint action, representation, or collective exercise of rights by tokenholders shall require the existence of an express legal basis, which must be established in advance, sufficiently and verifiably, and shall include only the following cases: (i) an express mandate conferred in accordance with applicable law; (ii) a duly formalized assignment of rights; or (iii) mechanisms for collective representation or coordination expressly established in the issuance documentation or in subsequent validly adopted agreements, provided they are compatible with the current regulatory framework. Apart from the cases indicated above, the existence of implicit, tacit, or supplementary mechanisms of collective representation shall not be recognized, nor shall any person be deemed to hold the authority to act on behalf of or in the interest of the tokenholders as a group. Furthermore, no provision contained in this Material Information Document shall be interpreted as the creation, recognition, or indirect establishment of a common representative, nor as the conferral of powers of collective representation in the absence of an express designation in accordance with the law.

The interest rate, whether fixed or variable, will be determined prior to the placement of each tranche and communicated through official channels.

For the fixed rate, interest will accrue and be calculated daily on the nominal balance of the tokens held by each investor, using a 365-day basis.

$$\text{Intereses} = \text{Saldo Nominal} \times \text{Tasa Fija Anal} \times \frac{\text{Días del período}}{365}$$

For the variable rate, the TIBP, SOFR, or Term SOFR—as established prior to the placement of each tranche—will be used as a reference, plus a fixed surcharge of no less than 0.10% per annum:

$$Tasa\ Variable = Tasa\ de\ Referencia + Sobretasa$$

Interest will also accrue and be calculated daily, applying the resulting variable rate:

When minimum or maximum rates are established, the resulting rate will be subject to those limits. The applicable rate, the surcharge, the payment frequency, and other conditions will be disclosed prior to the placement of each tranche. The calculation and tracking of returns will be carried out through the token platform.

The issuance of ATLÁNTIDA01 debt tokens includes an early redemption option by BANCO ATLÁNTIDA EL SALVADOR, S.A., which allows it to redeem or repay, in whole or in part, the issued tokens prior to the maturity date of the corresponding tranche. The tokens subject to redemption will be withdrawn from circulation and permanently destroyed (burned).

This option provides the Issuer with the flexibility to optimize the management of its financial structure, reduce interest payment obligations, and improve the administration of its debt obligations, in line with the program's progress and market conditions.

Early Redemption

The Issuer will notify the National Commission on Digital Assets (CNAD) of the dates, number of tokens, and repurchase prices at least 10 days in advance, ensuring transparency in the process and guaranteeing that investors have sufficient information to make decisions about their investment.

The Issuer's option to redeem ATLÁNTIDA01 tokens early will apply to all tranches during the term of the issuance.

Criteria for determining whether the issuer will exercise the early redemption option:

- If market conditions are favorable for the issuer to exercise the option
 - Improvements in the financial or cash flow profile that allow for early repayment.
 - Plans for refinancing at a lower cost.
 - Corporate strategies to optimize liabilities or financial structure.
-

The amount to be paid by the Issuer in the event of exercising the early redemption option for the ATLÁNTIDA01 tokens will be equal to the principal owed as of the effective date of redemption, plus interest accrued and unpaid through that date.

The early redemption amount will be determined according to the following formula:

Redemption Amount = Principal Owed + Accrued and Unpaid Interest

The buyback, if applicable, will be executed through the platform of BANCO ATLÁNTIDA EL SALVADOR, S.A., in its capacity as an authorized Digital Asset Service Provider, in accordance with market best practices, thereby strengthening investor confidence and security.

**Token Interest Accrual
Mechanism**

The tokens will accrue interest in favor of their holders on the outstanding principal balance during the term of each tranche of the Offering, in accordance with the applicable interest rate defined at the time of placement.

The interest rate may be fixed or variable, as determined by the Issuer prior to each placement, based on market conditions.

Interest payments will be made in accordance with the frequency established for each tranche, which may be monthly, quarterly, semiannually, annually, or at maturity, as specified in the Public Offering Notice for the corresponding tranche.

If the interest rate is determined to be fixed, such rate shall be set within a range of two percent (2.00%) to eight percent (8.00%) per annum. The specific fixed interest rate applicable to each tranche of the issuance shall be separately determined and disclosed. Therefore, the range indicated above shall serve as the parameter within which Banco Atlántida El Salvador, S.A. will establish the fixed interest rate for each tranche, with the final rate being subject to the specific terms and conditions of the relevant tranche and its disclosure in the Placement Notice.

Total Issue Amount	The total amount of the Offering is up to USD \$300,000,000.00 (THREE HUNDRED MILLION UNITED STATES DOLLARS), which may be offered in part and on a progressive basis through various tranches, subject to market conditions and as determined by the Issuer in each Public Offering Notice.
Number of tokens to be issued at the time of issuance	The maximum number of authorized tokens is up to 300,000,000 tokens. This amount corresponds to the maximum number of tokens that may be issued under the issuance program, which may be offered in part and on a progressive basis through various tranches, subject to market conditions and as determined by the Issuer in each Public Offering Notice. Consequently, not all authorized tokens will necessarily be issued or placed at the start of the Offering.
Principal and Other Payments to Token Holders	Holders of ATLÁNTIDA01 tokens will be entitled to receive interest payments and the return of the principal invested within the timeframe stipulated for each issued tranche, in accordance with the established terms. 1. Payment Schedule • Interest and principal payments will be made in accordance with the Offering Notice for each Tranche and applicable documents; however, partial payments of principal and/or interest may be made. Any early payment, redemption, prepayment, or repurchase will only be permitted when provided for in the respective Tranche Notice and in accordance with its specific conditions. Before making such a payment, the issuer will take into account its financial stability and any outstanding obligations. 2. Payment Frequency • Payment of interest, returns, or other amounts derived from the tokens will be made in accordance with the frequency, dates, calculation methods, and other conditions established for each issued tranche in the corresponding documents. The Issuer may make partial or advance payments, provided that such payments are permitted under the documents applicable to the respective tranche. To this end, the Issuer may consider its liquidity, financial stability, outstanding obligations, regulatory requirements, market conditions, and other factors relevant to the proper management of the issuance.

3. Guarantee and Security of the Investment

- The issuance of debt tokens (ATLÁNTIDA01) is not backed by any specific guarantee, whether in the form of real or personal security, fiduciary arrangements, and/or pledges; however, it is backed by the general assets of the issuer, BANCO ATLÁNTIDA EL SALVADOR, S.A., and therefore constitutes an unsecured obligation. Consequently, investors hold the status of ordinary creditors of the issuer, with no preference or special priority over other unsecured creditors.

The Debt Acknowledgment Framework Agreement does not constitute a guarantee in favor of investors, but rather the legal mechanism through which the underlying credit obligation in favor of the token holders is formalized, documented, and made enforceable; this agreement will be executed within a period not exceeding 30 business days, counted from the date of acquisition of the tokens.

However, the obligations arising from ATLÁNTIDA01 will be unsecured, and, unless otherwise required by law or in the case of a debt with specific priority, they will be treated on an equal footing with the Bank's other common unsecured obligations.

4. Transparency and Payment Management

- Interest payments and principal repayments will be processed through automated mechanisms supported by *blockchain* technology on the Algorand network, which will generate the corresponding payment instructions in accordance with the terms of the issuance. The execution and final validation of payments will require operational intervention by the Bank, ensuring applicable internal controls, as well as the traceability and transparency of each transaction.

The Bank's financial stability does not permit the unilateral suspension of agreed-upon payments, unless there is an expressly provided contractual, regulatory, or legal provision to that effect.

Term of the Issue

The public offering will have a term of no more than 120 months; however, since the offering will be conducted in tranches, no single tranche will exceed the total term of the offering.

At the end of the offering period, the tokens will be canceled once the principal and interest have been paid.

The issuing company reserves the right to delist the issued tokens in the

event of cyberattacks or law enforcement requests.

**Are decentralized
ledgers () and smart
contracts or equivalents
used?**

The Issuer, BANCO ATLÁNTIDA EL SALVADOR, S.A., will use the Algorand *blockchain* protocol, recognized for its advanced security through verifiable random functions (VRF) and its scalability, with processing times of less than 3 seconds per block.

The smart contracts, developed under the Algorand Smart Contracts (ASC1) standard, will manage the issuance, transfer, and trading of the tokens, ensuring compliance with predefined conditions such as transfer restrictions or lock-up periods. These tools guarantee transparency and security in all transactions.

The custody and security of the tokens will be the responsibility of BANCO ATLÁNTIDA EL SALVADOR, S.A., in its capacity as an authorized Digital Asset Service Provider that implements advanced technologies such as multi-factor authentication, data encryption, and continuous monitoring. These robust measures reinforce investor confidence in the secure management of their digital assets.

**Tradability and
Secondary Market**

The ATLÁNTIDA01 token will have a primary market from the start of the issuance, and the secondary market will be available starting with the first placement of the first tranche of the issuance. Both markets will be developed and managed exclusively on the platform of the Digital Asset Service Provider (PSAD) BANCO ATLÁNTIDA EL SALVADOR, S.A., ensuring transparency, efficiency, and accessibility for investors.

The existence of a secondary market does not guarantee liquidity, the availability of buyers, an exit price, stability in the token's value, or the full or partial recovery of the invested capital.

The sale or transfer price of ATLÁNTIDA01 tokens on the secondary market will be freely agreed upon between the seller and the buyer, in accordance with the trading conditions agreed upon by the parties and the procedures established by the PSAD.

Market Surveillance

BANCO ATLÁNTIDA EL SALVADOR, S.A., in its capacity as issuer, undertakes to constantly monitor and oversee market conditions and dynamics, focusing its efforts on preventing and mitigating any practices that could lead to the manipulation of securities traded on the platform where the tokens are traded, prioritizing the early detection and prevention of unauthorized activities or manipulation of the platform.

Listing	The ATLÁNTIDA01 token will be listed and made available for trading on the platform administered by BANCO ATLÁNTIDA EL SALVADOR, S.A., in its capacity as an authorized Digital Asset Service Provider, once the applicable internal procedures, technological controls, operational validations, compliance requirements, and regulatory authorizations have been fulfilled. The availability of the token on the platform will be subject to the internal operational management of the corresponding tranche, the publication of the respective Public Offering Notice, the technological configuration of the digital asset, and compliance with the conditions set forth in this Material Information Document, the respective Placement Tranche Notice, and the issuance documents.
Settlement	Payments of principal, interest, amortizations, redemptions, or reimbursements arising from the ATLÁNTIDA01 token may be obtained through the main trading platform, managed by BANCO ATLÁNTIDA EL SALVADOR, S.A.
Sales Restrictions	The token must not be distributed to entities or countries subject to sanctions according to international sanctions lists.
Trading Currency	United States dollars.
Payment Methods for Purchasing the Offered Assets	Payment Methods The subscription and purchase of tokens issued under this program will be conducted exclusively through direct debit, and the investor must maintain sufficient funds in the bank account previously registered and authorized for this purpose. At the time of purchase, the investor expressly authorizes Banco Atlántida El Salvador, S.A. to debit from the designated account the amounts corresponding to the value of the subscribed Tokens.
Issue Arranger	BANCO ATLÁNTIDA EL SALVADOR, S.A. 1st Street West and Constitución Boulevard #3538, Escalón Neighborhood, San Salvador. https://www.bancoatlantida.com.sv/ Contact Phone Number: +503 2223-7676

CNAD Registration Number – PSAD-0035.

**Digital Asset Services
Provider**

BANCO ATLÁNTIDA EL SALVADOR, S.A.

1st West Street and Constitución Boulevard #3538, Escalón
Neighborhood, San Salvador.

<https://www.bancoatlantida.com.sv/>

Contact Phone Number: +503 2223-7676

CNAD Registration Number – PSAD-0035.

BANCO ATLÁNTIDA EL SALVADOR, S.A. acts as a registered Digital
Asset Service Provider (PSAD), ensuring the proper management and
custody of the tokens issued under this offering.

For the operational execution of the issuance and administration of the
digital assets, BANCO ATLÁNTIDA EL SALVADOR, S.A. has
implemented a specialized technological infrastructure that provides the
platform for the issuance, trading, and management of the digital assets.

Digital Asset Certifier

TR CAPITAL, S.A. DE C.V.

Calle Cuscatlán, #4312, Col. Escalón, San Salvador, El Salvador.

<https://www.trcapital.net/>

CNAD Registration Number - CERT-0003

Designated Contact Person: Héctor Ramón Torres Córdova

Contact Phone Number: +503 2538-6360

Contact email: info@trcapital.net

Digital Asset Custodian

BANCO ATLÁNTIDA EL SALVADOR, S.A.

1st West Street and Constitución Boulevard #3538, Escalón
Neighborhood, San Salvador.

Contact phone number: +503 2223-7676

<https://www.bancoatlantida.com.sv/>

CNAD Registration Number – PSAD-0035

It is responsible for the custody and administration of digital assets
issued under the ATLÁNTIDA01 token. Its primary function is to ensure
the security, traceability, and transparency of transactions through
blockchain technology, in compliance with applicable regulatory
provisions.

Applicable Laws

Laws of the Republic of El Salvador

A. Objectives of the Issuance

BANCO ATLÁNTIDA EL SALVADOR, S.A. announces the issuance of ATLÁNTIDA01 debt tokens, which consists of a tokenized debt program divided into tranches, as a strategic tool to strengthen its financing structure and support the growth of its active operations, as well as to match funding, provide liquidity, or serve other permitted banking purposes, by leveraging new technologies and the benefits provided by El Salvador's Digital Asset Issuance Law (LEAD). The primary purpose of the ATLÁNTIDA01 token issuance is to optimize the bank's funding sources and support the achievement of its strategic objectives in the area of financial intermediation.

This issuance aims to provide investors with the opportunity to participate, through debt instruments, in the financing of lending operations, as well as for funding, liquidity, or other permitted banking purposes, with a focus on sustainability, economic development, and high social impact.

B. The main strategic objectives of the offering are:

- **To finance the company's operations:** To raise capital to support and finance active operations and to address funding, liquidity, or other permitted banking purposes of the bank, enabling the placement and management of credit products in accordance with its customers' needs, while simultaneously strengthening the institution's funding and liquidity structure.
- **Expand access to financial services:** Facilitate financial inclusion through a diversified product offering tailored to different customer segments and market needs.
- **Optimize costs and operational efficiency:** Reduce reliance on traditional intermediaries, lowering transaction costs and simplifying access to investment opportunities.
- **Promote transparency and security in the investment process:** Leverage the advantages of blockchain technology to ensure an immutable and reliable record of transactions.

The issuance is intended to finance the company's active operations, allowing it to channel resources toward credit products designed to meet market needs. The financing structure offers flexibility in terms of amounts and terms, aligning with the bank's operational dynamics. The applicable interest rate will be subject to market conditions, ensuring competitiveness, financial sustainability, and consistency with investor expectations.

As part of its growth strategy, the bank will strengthen its lending activities through commercial partnerships and direct customer service, offering financing solutions tailored to different risk profiles and financial requirements. This approach will enable the bank to expand its customer base, diversify its lending operations or pursue other permitted banking purposes, and facilitate access to financing through agile and efficient mechanisms.

The business model is grounded in innovation and financial inclusion, utilizing digital assets as an efficient funding mechanism to support lending operations, as well as for funding matching,

liquidity, or other permitted banking purposes. In this way, a modern and sustainable financial ecosystem is fostered, in which investors, the bank, and end customers benefit from a flexible financing structure aligned with market best practices.

c. Token Pricing Description

To assess the financial viability of BANCO ATLÁNTIDA EL SALVADOR, S.A., it is essential to analyze the performance of revenues, costs, and changes in equity over the projected period, which spans from 2026 to 2036.

d. Financial Projections for the Issuance,

A comprehensive financial model is presented that includes the key assumptions of the offering, the financial projections, and the estimated cash flows expected over the term of the offering. As a central part of the analysis, the projected Income Statement and Balance Sheet are included, which allow for an evaluation of the Issuer's expected performance, revenue generation, and financial stability. See Appendix IV – Financial Projections for Banco Atlántida El Salvador, S.A.

I. Regarding the Income Statement

The Income Statement presents the main categories of monthly revenue, costs, and profits. This breakdown allows for an evaluation of financial performance on a month-by-month basis, highlighting the generation of operating revenue and the cost structure associated with the program.

II. About the Balance Sheet

The Balance Sheet provides a detailed overview of the projected assets, liabilities, and equity of BANCO ATLÁNTIDA EL SALVADOR, S.A. This report is essential for analyzing the issuer's liquidity, solvency, and financial structure, providing key information to assess its ability to generate value over time.

III. About Free Cash Flow (FCF)

The projected cash flow provides a detailed view of month-to-month cash inflows and outflows, offering crucial information on liquidity generation and the ability to meet operating, investment, and financing obligations over time. This analysis allows for an assessment of financial sustainability and the ability to generate net value for investors.

The general formula for calculating FCF is:

$$\text{FCF} = \text{Net Income for the Period} + \text{Operating Cash Flow} + \text{Investing Cash Flow} + \text{Financing Cash Flow}$$

IV. Covenants and Investor Protection Provisions

During the term of the issuance, Banco Atlántida El Salvador, S.A., in its capacity as Issuer, will maintain the following commitments to protect investors' rights and ensure compliance with the obligations arising from the tokens.

Positive covenants: The Issuer agrees to make timely payments of principal and interest, maintain its accounting and financial records, provide the information required by applicable regulations, and disclose any event that could materially affect compliance with the terms of the issuance.

Negative covenants: The Issuer shall refrain from taking any actions that violate applicable regulations or that materially affect its ability to meet the obligations arising from the issuance.

Financial covenants: Banco Atlántida El Salvador, as a banking institution supervised by the Superintendency of the Financial System, must maintain the following financial covenants throughout the term of the issuance:

- **Capital ratio:** Equity divided by Risk-Weighted Assets, which must be greater than 12%.
- **Legal Debt Ratio:** Equity divided by Total Liabilities, which must be greater than 7%.

The two indicators mentioned above constitute binding financial covenants for the Issuer and have been calculated on an aggregate basis within the financial model to simplify the projections. The other indicators included in the model are presented solely for analysis and monitoring purposes; therefore, they are indicative in nature and do not constitute binding covenants.

V. Default and Waiver Procedure

If the Issuer breaches any of the established covenants, it will assess the causes, the impact, and the measures necessary to remedy the breach. The breach will be communicated to tokenholders through the official channels established in this DIR and to the National Commission on Digital Assets within 30 days of the occurring breach.

The Issuer will have a period of 90 calendar days from the identification of the breach to remedy it, unless applicable regulations require immediate action.

E. Operational Controls for Dual Participation (Issuer and PSAD)

Issuer / PSAD: Banco Atlántida El Salvador, S.A.

Operational Segregation:

Functional separation between areas responsible for structuring and deciding on the issuance, operating as a PSAD, custody, and registration of Digital Assets, and areas responsible for compliance, risk, accounting, and reconciliation, through distinct reporting lines and system access controls.

Internal Authorizations:

Each placement and each Tranche Notice requires prior internal approvals in accordance with the delegation of authority matrix, including regulatory, operational, technological, risk, and KYC/AML validation.

Traceability prior to placement:

Investor identification, KYC/AML verification, recording of the transaction in the PSAD's systems, and validation of the channels for receiving funds, prior to the issuance of the Digital Assets.

Fund Escrow (if applicable):

Funds received may be held in operational escrow until the minimum placement amount is met, in accordance with the provisions of the DIR and the corresponding Tranche Notice.

Post-placement reconciliation:

Reconciliation of funds received and Digital Assets issued, verification of accounting and technological records, confirmation of placed and current balances, and validation of the allocation to investors.

Traceability and Documentation:

Retention of records, authorizations, reconciliations, and operational logs for each tranche, available to CNAD, competent authorities, and internal or external auditors.

Ongoing controls:

Ongoing monitoring, detection of deviations, and activation of internal escalation procedures when appropriate.

Disclosure to Investors:

The controls described are intended to ensure operational integrity, the proper management of funds, and the traceability of investments, without constituting a guarantee of results or returns.

F. Underlying Asset

The underlying asset of the ATLÁNTIDA01 debt tokens consists of a tokenized debt program organized into tranches, up to a maximum amount of USD \$300,000,000.00, representing payment obligations of BANCO ATLÁNTIDA EL SALVADOR, S.A., in its capacity as Issuer, to the holders of such tokens, in accordance with the terms and conditions set forth in this Material Information Document and in the specific terms of each tranche. Such obligations will be subject to the provisions of the issuance documentation, as well as to the applicable risks and factors described therein.

and the specific terms of each tranche.

The issuance will be documented by a Master Debt Acknowledgment Agreement, which will constitute the legal instrument through which the Issuer will acknowledge the payment obligations that may arise on its part, including principal, interest, amortizations, redemptions, or repayments owed to the holders of ATLÁNTIDA01 tokens, in accordance with the terms and conditions set forth in the issuance documentation.

Payment of principal and interest will be made in accordance with the terms, conditions, dates, frequency, and other financial characteristics set forth in the respective Public Offering Notice for each tranche.

The Master Debt Recognition Agreement must be executed within a maximum period of thirty (30) business days from the date the issuance is authorized by the National Commission on Digital Assets (CNAD).

It is important to clarify that the issuance program will be non-revolving; consequently, payments, amortizations, redemptions, or maturities of the issued tokens will neither restore nor increase the availability of the maximum authorized amount.

G. Market and Marketing

The ATLÁNTIDA01 token will feature:

- A primary market available from the start of the offering.
- Secondary market enabled from the first placement of the issuance.

The sale or transfer price of ATLÁNTIDA01 tokens on the secondary market will be freely agreed upon between the seller and the buyer, in accordance with their own terms of trade. However, it is hereby established that the issuance of ATLÁNTIDA01 debt tokens, in both the primary and secondary markets, will be conducted through the platform of Banco Atlántida El Salvador, S.A., in accordance with the applicable terms and conditions.

The existence of a secondary market does not guarantee liquidity, available buyers, an exit price, or the recovery of invested capital.

H. Guarantee

The issuance of ATLÁNTIDA01 debt tokens is not backed by any specific, real, personal, fiduciary, and/or collateral guarantee; they are backed by the Bank's general assets; investors are unsecured creditors, and their enforceability derives directly from the contractual relationship as set forth in the Debt Recognition Framework Agreement.

Furthermore, this unsecured nature means that, in the event of the issuer's default or liquidation, investors/tokenholders will participate and act individually and on an equal footing with other unsecured creditors, in accordance with the applicable rules of priority of claims, thereby assuming the general credit risk associated with the issuing institution. In the event of intervention, resolution, liquidation, revocation of authorization, or any other measure applicable to the bank, the rights of tokenholders will be subject to the legal order of priority applicable to unsecured creditors.

For the sake of regulatory clarity, it is expressly stated that the Master Debt Recognition Agreement does not constitute a guarantee in favor of investors, but rather consists of the legal mechanism through which the underlying credit obligation in favor of the token holders is formalized, documented, and made enforceable; therefore, it constitutes an unsecured obligation. Consequently, investors hold the status of ordinary creditors of the issuer, without any preference or special priority over other unsecured creditors.

In this regard, fulfillment of the obligations arising from the issuance depends on the issuer's solvency and creditworthiness, as well as on the performance of its active operations—including those related to the structuring and placement of the ATLÁNTIDA 01 debt tokens—and on the proper management of its financial risks and the performance of its active operations. This unsecured nature means that the issuer is liable with all of its assets, without any specific assets or rights being pledged as collateral in favor of the token holders.

Furthermore, this unsecured nature means that, in the event of the issuer's default or liquidation, investors would rank on an equal footing with other unsecured creditors, in accordance with the applicable rules governing the priority of claims, and would therefore assume the general credit risk associated with the issuing institution.

I. Key points supporting financial reasonableness

- **Contractual stability:** The bank's lending operations are structured through loan agreements with clearly defined terms and conditions, which allow for adequate predictability of future cash flows derived from principal and interest payments.
- **Market responsiveness:** The bank's business model provides flexibility to adapt lending terms—including maturities, interest rates, and financial structures—in response to

changing market conditions, thereby optimizing risk-adjusted returns.

- **Financial sustainability:** Revenue generated from lending operations, as well as other permitted banking activities, provides a solid and recurring foundation for financing the bank's operations, strengthening its financial stability, mitigating operational risks, and ensuring the efficient execution of its growth strategy.

J. Redemption or Buyback Option

The issuance of ATLÁNTIDA01 debt tokens includes an early redemption option by BANCO ATLÁNTIDA EL SALVADOR, S.A., which allows it to redeem or repay, in whole or in part, the issued tokens prior to the maturity date of the corresponding tranche. The tokens subject to redemption will be withdrawn from circulation and permanently destroyed (burned).

This option provides the Issuer with the flexibility to optimize the management of its financial structure, reduce interest payment obligations, and improve the administration of its debt obligations, in line with the program's progress and market conditions.

The Issuer will notify the National Commission on Digital Assets (CNAD) of the dates, number of tokens, and repurchase prices at least 10 days in advance, ensuring transparency in the process and guaranteeing that investors have sufficient information to make decisions about their investment.

The Issuer's option for early redemption of ATLÁNTIDA01 tokens shall apply to all tranches during the term of the issuance.

The amount to be paid by the Issuer in the event of exercising the early redemption option for ATLÁNTIDA01 tokens will be equal to the principal amount due as of the effective redemption date, plus interest accrued and unpaid through that date.

The early redemption amount will be determined according to the following formula:

Redemption Amount = Principal Owed + Accrued but Unpaid Interest.

The repurchase, if applicable, will be executed through the platform of BANCO ATLÁNTIDA EL SALVADOR, S.A., in its capacity as an authorized Digital Asset Service Provider, in accordance with best market practices, thereby strengthening investor confidence and security.

K. Objectives of the Buyback Option

The buyback option is designed as a tool that allows BANCO ATLÁNTIDA EL SALVADOR, S.A. to:

- Adjust its financing structure, adapting to the program's specific needs throughout its

implementation.

- Optimize liability management, maintaining a sustainable financial balance that supports the program's success.
- Adapt to changing market conditions, with the flexibility to respond to situations such as:
Access to more cost-effective sources of capital.
- The need to consolidate the program's economic rights.
- Opportunities for financial restructuring that improve operational efficiency.

L. Mechanism and Conditions for Early Redemption

If the Issuer decides to exercise the early redemption option, the process will include the following conditions:

- **Redemption Amount:** The amount payable to holders will be calculated based on the outstanding principal balance as of the effective date of redemption, plus interest accrued and unpaid through that date, plus, where applicable, a redemption premium. Such premium will be determined by the Issuer, taking into account prevailing market conditions
- **Transparent and Efficient Management:** The early redemption will be executed through the platform of BANCO ATLÁNTIDA EL SALVADOR, S.A., ensuring:
 - Operational efficiency in the execution of the process.
 - Full transparency at every stage of the repurchase.
 - Alignment with best market practices to protect the interests of all participants.

Benefits of the Early Redemption Option

The inclusion of this option reinforces BANCO ATLÁNTIDA EL SALVADOR, S.A.'s commitment to financial sustainability, efficient liability management, and strategic adaptability. Key benefits include:

- **Flexibility for the issuer:** It allows the issuer to optimize its funding structure and efficiently manage its financial obligations in accordance with market conditions.
- **Financial balance and sustained operations:** It facilitates efficient management of financial resources, helping to maintain the program's strength and sustainability.
- **Protection of investors' interests:** The redemption mechanism guarantees full payment of the outstanding principal and interest accrued as of the redemption date, and may also include a redemption premium that represents an additional benefit for holders, providing certainty regarding the applicable economic terms.

The Issuer's option to redeem ATLÁNTIDA01 tokens early will apply to all tranches during the term of the issuance.

The early redemption amount will be determined according to the following formula:

Redemption Amount = Outstanding Principal + Accrued but Unpaid Interest

When the Issuer exercises the early redemption option, the holders of the tokens subject to redemption shall receive the corresponding payment in accordance with the terms established for the issuance, after which the respective tokens will be canceled and burned.

M. Guarantee

The issuance of ATLÁNTIDA01 debt tokens is not backed by any specific, real, personal, fiduciary, and/or pledge-based guarantee; they are backed by the Bank's general assets; investors are unsecured creditors, and their enforceability derives directly from the contractual relationship as set forth in the Debt Recognition Framework Agreement.

Furthermore, this unsecured nature means that, in the event of the issuer's default or liquidation, investors/tokenholders will participate and act individually and on an equal footing with other unsecured creditors, in accordance with the applicable rules of priority of claims, thereby assuming the general credit risk associated with the issuing institution. In the event of intervention, resolution, liquidation, revocation of authorization, or any other measure applicable to the bank, the rights of tokenholders will be subject to the legal order of priority applicable to unsecured creditors.

For the sake of regulatory clarity, it is expressly stated that the Debt Recognition Framework Agreement does not constitute a guarantee in favor of investors, but rather consists of the legal mechanism through which the underlying credit obligation in favor of the token holders is formalized, documented, and made enforceable.

N. Minimum and Maximum Amounts of the Offering

I. Maximum Amount.

The maximum amount or total amount of the issuance is USD \$300,000,000.00 (THREE HUNDRED MILLION UNITED STATES DOLLARS), during the authorization period, which is up to 10 years.

BANCO ATLÁNTIDA EL SALVADOR, S.A., in its capacity as issuer, may conduct multiple offerings by tranches. All tranches of the offering will be identified under the general designation ATLÁNTIDA01. Notwithstanding the foregoing, each tranche will have a specific and consecutive identification number, in accordance with its order of placement, using the designation ATLÁNTIDA01 – Tranche 1, ATLÁNTIDA01 – Tranche 2, ATLÁNTIDA01 – Tranche 3, and so on.

Under no circumstances may the total sum of the face value of the Debt Tokens issued exceed the duly authorized maximum amount.

The total amount of the issuance was strategically determined by considering the Bank's funding needs, the expected volume of active transactions, liquidity requirements, maturity and rate

matching management, as well as its capital and regulatory capacity to assume the obligations arising from this issuance.

II. Minimum Purchase Amount per Investor.

The minimum purchase amount for the ATLÁNTIDA01 token offering is USD \$1,000.00 (ONE THOUSAND UNITED STATES DOLLARS), equivalent to the purchase of one thousand tokens.

III.

The minimum placement amount required to validate the validity of the offering is USD \$500,000.00 (FIVE HUNDRED THOUSAND UNITED STATES DOLLARS).

The issuer will have a maximum period of six (6) months to reach this minimum initial placement amount. If this amount is not reached within the established period, a refund mechanism will be activated to guarantee investors a full refund of their invested capital.

This process will be managed through the trading platform used for the offering, ensuring transparency and efficiency at every stage.

Investors participating in this Public Offering will be entitled to recover their investment if the minimum placement amount of USD \$500,000.00 is not reached by the end of the defined period, or in the event of cancellation of the offering, in accordance with the mechanism detailed below:

It is important to note the following:

- Maximum or total amount of the offering: USD \$300,000,000.00 (THREE HUNDRED MILLION UNITED STATES DOLLARS).
- Minimum placement amount required for the issuance to remain in effect: USD \$500,000.00 (FIVE HUNDRED THOUSAND UNITED STATES DOLLARS).
- Deadline for reaching the minimum placement amount: Six months from the launch of the public offering.
- If the minimum placement amount is not reached within the stipulated period, a refund mechanism will be triggered, ensuring that investors recover 100% of their invested capital, without any deductions or additional charges.
- The refund will not include interest or returns, as these will not have accrued by the date of cancellation of the offering, ensuring that investors receive a return on their investment.
- This structure is designed to protect investors' funds, guaranteeing the transparency and financial security of the offering, and ensuring that payments are made in accordance with the priorities established in the offering's structure.
- No placement tranche of the issuance may exceed the maximum authorized term of the issuance or have a maturity date later than the maximum term of 120 months.

The issuance program will be non-revolving; consequently, payments, amortizations, redemptions, or maturities of the placed tokens will not restore or increase the availability of the maximum authorized amount.

The Issuer's option to repurchase ATLÁNTIDA01 tokens shall apply to all tranches throughout the term of the issuance. The specific conditions for exercising this option must be detailed in the offering notice for each tranche.

ATLÁNTIDA01 tokens that are amortized, repurchased by the Issuer, or paid upon maturity will be permanently burned or rendered unusable, in accordance with applicable technological and operational procedures.

Such burning or reduction of the number of tokens in circulation will not be revolving in nature nor will it restore issuance capacity within the maximum authorized amount. Consequently, amounts previously placed will be definitively counted against the total issuance limit, even if the corresponding tokens have been redeemed, repurchased, paid, or burned.

Trading Currency: United States Dollars.

IV. Means of Payment

The subscription and purchase of tokens issued under this program will be conducted exclusively through direct debit, and the investor must maintain sufficient funds in the bank account previously registered and authorized for this purpose.

At the time of purchase, the investor expressly authorizes Banco Atlántida El Salvador, S.A. to debit from the designated account the amounts corresponding to the value of the subscribed Tokens, as well as any applicable commissions or fees, in accordance with the terms and conditions set forth in the offering documentation.

V. Redemption Process.

If, at the end of the 6-month placement period, the minimum placement amount of USD \$500,000.00 (FIVE HUNDRED THOUSAND UNITED STATES DOLLARS) for the ATLÁNTIDA01 debt tokens is not reached, the offering will not take effect, and the principal contributed by the initial participants will be refunded in full, in accordance with the terms and conditions set forth in the Relevant Information Document (DIR). This mechanism ensures that the program will only be executed if it has full financing for each tranche required for its development.

The refund will not include returns, interest, or other amounts, since the issuance will not have become effective and no cash flows will have been generated.

To ensure the transparency, traceability, and security of the process, the return of funds will be carried out in accordance with the following procedure:

VI. Refund Process in the Event the Minimum Placement Amount Is Not Reached

1. Verification of Compliance with the Placement Condition

- At the end of the six (6) month placement period, counted from the start date of the offering, a verification will be conducted to determine whether the minimum amount required for the issuance to proceed has been reached.
- If this condition is not met, the procedure for returning funds to investors will be initiated.

2. Notification to Investors

- Investors will be notified, through the communication channels established for the offering, of the failure to meet the minimum placement amount required.
- The notification will include the procedure for refunding funds, the applicable deadlines, and any information relevant to the execution of the refund.
- Such notification will be provided within 5 business days following the expiration of the placement period.

3. Execution of the Refund

- The Issuer will proceed to refund one hundred percent (100%) of the principal contributed by each investor.
- No returns, interest, or distributions will be recognized, as the offering will not have taken effect.
- The refund will be made within a maximum of fifteen (15) business days from the date of notification to investors.

4. Confirmation of the Refund

- Prior to processing the refunds, the necessary internal reconciliations and validations will be performed to ensure the accuracy of the amounts to be refunded.
- Investors will be notified of the completion of the refund process through the communication channels established for the offering.
- Records and documentary evidence will be maintained to verify the amounts refunded, the payment dates, and the transactions carried out as part of the refund process.

5. Record-Keeping and Traceability

- The entire refund process will be recorded on the technology platform used for issuance, allowing for the traceability of the transactions carried out.
- Reports or certificates may be issued to confirm the successful completion of the fund return process.

- This framework ensures that investors are protected against potential contingencies related to the initial placement of the offering, thereby strengthening transparency, security, and confidence in the program.

Access to Secondary Markets and Flexibility for Investors

The issuance structure includes the possibility of trading on secondary markets, facilitated through the platform of BANCO ATLÁNTIDA EL SALVADOR, S.A., beginning with the initial placement of the issuance in tranches. This provides liquidity to investors, allowing them to flexibly manage their holdings throughout the term of the issuance.

The sale or transfer price of ATLÁNTIDA01 tokens on the secondary market will be freely agreed upon between the seller and the buyer, based on their negotiations. The existence of a secondary market does not guarantee liquidity, available buyers, an exit price, or the recovery of invested capital.

o. Term of the Offering and Structuring

The term of the issuance will be up to 120 months (10 years), subject to compliance with the conditions established during the Sales Window. At the end of this period, the ATLÁNTIDA01 tokens for each placement tranche will be delisted once principal and interest payments have been made to investors.

The issuing company, BANCO ATLÁNTIDA EL SALVADOR, S.A., reserves the right to mint or delist the issued tokens in the event of technological breaches, such as cyberattacks, or in response to law enforcement requests, in compliance with local and international regulations.

During the term of the issuance, holders of ATLÁNTIDA01 tokens will earn interest periodically; payment will be made in accordance with the terms established for each placement tranche. However, partial payments of principal and/or interest may be made in accordance with the Placement Notice for each tranche and applicable documents.

Payment of interest, returns, or other amounts derived from the tokens will be made in accordance with the frequency, dates, calculation methods, and other conditions established for each issued tranche in the corresponding documents.

The Issuer may make partial or advance payments, provided that such payments are permitted under the documents applicable to the respective tranche. For this purpose, the Issuer may consider its liquidity, financial stability, outstanding obligations, regulatory requirements, market conditions, and other factors relevant to the proper management of the issuance.

The Issuer must complete the repayment of the principal invested upon maturity of the issuance, ensuring full compliance with its obligations to ATLÁNTIDA01 investors.

Once the final payment of principal and accrued interest on the tokens issued in each tranche has been made, the ATLÁNTIDA01 tokens will be delisted, thereby concluding the issuance of that tranche until the maximum issuance amount is reached.

P. Contractual and Financial Backing

The contracts and financial projections underpinning the issuance are documented to provide transparency and support for the issuance.

- **Contractual Structure:** The DIR establishes the conditions under which the principal plus interest generated by the Bank's active operations or other permitted banking activities will be allocated to investors.
- **Financial Projections:** Financial models have been developed that include estimates of revenue, costs, and operating expenses, in order to evaluate the viability and the ability to generate future cash flows.
- **Traceability and Legal Certainty:** The documentation supporting the issuance is aligned with the applicable regulatory framework in El Salvador, ensuring that the program complies with the provisions of the Digital Asset Issuance Law (LEAD) and other relevant regulations.

This contractual and financial approach guarantees the protection of investors' rights, providing a solid framework for the administration and distribution of the interest generated.

Q. Token Burn and Refund Process

Should it become necessary to exercise this authority, a transparent and structured procedure will be activated to ensure the proper return of capital to investors, in accordance with the following steps:

1. Identification of the Circumstance

BANCO ATLÁNTIDA EL SALVADOR, S.A., will evaluate the exceptional situation justifying the token cancellation, taking into account technical, legal, and financial advice.

2. Internal Authorization and Notification

The cancellation of tokens will require approval by the issuer's board of directors, along with documented evidence of the need for the measure.

Investors will be notified via the BANCO ATLÁNTIDA EL SALVADOR, S.A. platform, with details including:

- The reason for the token cancellation.
- The timeline and steps to follow for reimbursement.

3. Calculation and Audit of the Refund

The redemption process, if necessary, will be calculated and audited by an independent third party to ensure transparency, fairness, and compliance with the terms established in the issuance.

In the event that the Issuer fails to repay the invested principal upon maturity of the issuance, the enforcement mechanisms of the debt instrument will be triggered, allowing ATLÁNTIDA01 holders to recover their funds through the liquidation of the underlying assets.

The amount to be repaid will correspond to the principal invested. The audit of the process will ensure that payments are made in accordance with the structure of the issuance, guaranteeing that holders of ATLÁNTIDA01 are the first to recover their investment before any other payments are made.

4. Transfer of Funds

The Issuer will transfer to BANCO ATLÁNTIDA EL SALVADOR, S.A. the funds necessary to process the redemptions within a maximum of 15 business days following official notification.

Refunds will be made directly to the bank accounts or digital wallets registered by investors on the platform.

5. Refund Confirmation

BANCO ATLÁNTIDA EL SALVADOR, S.A. will confirm the completion of the process, notifying both the investors and the issuer.

Each investor will receive a digital receipt detailing the amount refunded and any adjustments applied.

ATLÁNTIDA01 tokens that are redeemed, repurchased by the Issuer, or paid upon maturity will be permanently burned or rendered invalid, in accordance with applicable technological and operational procedures.

Such burning or reduction of the number of tokens in circulation will not be revolving in nature nor will it restore issuance capacity within the maximum authorized amount. Consequently, amounts previously placed will be definitively counted against the total issuance limit, even if the corresponding tokens have been redeemed, repurchased, paid, or burned.

R. Security and Transparency

ATLÁNTIDA01 token issuances are backed by *blockchain* technology based on the Algorand network, using the Algorand Smart Contracts (ASC1) standard, which guarantees traceability, immutability, and security in the administration of the tokens. This framework reinforces investor

confidence in the program and provides a clear framework for addressing any contingencies that may arise during the term of the issuance.

This issuance design balances flexibility and security, ensuring that any decisions made in response to exceptional events are carried out with the highest level of transparency and protection of investors' interests.

s. Token Trading Platform

The issuance and trading of the ATLÁNTIDA01 token will take place through the platform of BANCO ATLÁNTIDA EL SALVADOR, S.A., an authorized Digital Asset Service Provider (PSAD), ensuring a regulated, efficient, and transparent investment environment.

For the operation and management of the issuance, BANCO ATLÁNTIDA EL SALVADOR, S.A. will use its platform, ensuring a robust technological infrastructure for the issuance, trading, and administration of digital assets.

Investors will be able to access information and contact details regarding the issuance through the official website of BANCO ATLÁNTIDA EL SALVADOR, S.A. (<https://www.bancoatlantida.com.sv/>), where they will have access to advanced tools for managing and trading their digital assets.

BANCO ATLÁNTIDA EL SALVADOR, S.A., in its capacity as issuer, commits to constantly monitoring and overseeing market conditions and dynamics, focusing its efforts on preventing and mitigating any practices that could lead to the manipulation of securities traded on the platform where the tokens are marketed, prioritizing the early detection and prevention of unauthorized activities or manipulation of the platform.

To strengthen the internal control framework and mitigate associated risks, the platform will be managed by a team independent of the areas directly involved in the issuance structure. Consequently, operational autonomy is guaranteed between the Bank's staff and the team specialized in the maintenance and preventive control of the technological infrastructure.

This structure ensures that maintenance and control functions are carried out under a framework of **functional independence**, in line with best practices for operational risk management and institutional transparency.

t. Token Tradability

The ATLÁNTIDA01 token will have a primary market from the start of the issuance, and the secondary market will be available starting with the first placement of the first tranche of the issuance. Both markets will be developed and managed exclusively on the platform of the Digital

Asset Services Provider (PSAD) BANCO ATLÁNTIDA EL SALVADOR, S.A., ensuring transparency, efficiency, and accessibility for investors.

The existence of a secondary market does not guarantee liquidity, the availability of buyers, an exit price, stability in the token's value, or the full or partial recovery of the invested capital.

This will provide investors with:

- **Transparency and traceability:** All transactions will be recorded on the Algorand blockchain, ensuring an immutable and auditable history of each transaction.
- **Global accessibility:** It will allow both domestic and international investors to participate, facilitating the buying and selling of tokens without geographic restrictions.
- **Secondary market liquidity:** Investors will be able to freely trade their tokens on the platform, allowing for flexibility in managing their investments.
- **Operational efficiency:** Transactions will be executed quickly and securely, optimizing costs and reducing the need for traditional financial intermediaries.

The sale or transfer price of ATLÁNTIDA01 tokens on the secondary market will be freely negotiated between the seller and the buyer, in accordance with the trading conditions agreed upon by the parties and the procedures established by the PSAD.

The existence of a secondary market does not guarantee liquidity, available buyers, an exit price, or the recovery of invested capital.

With this structure, BANCO ATLÁNTIDA EL SALVADOR, S.A. reaffirms its commitment to financial innovation and the modernization of the financial sector, offering a digital asset with access to liquidity, security, and transparency within a regulatory framework.

u. Smart Contracts and Technology to Be Used

The ATLÁNTIDA01 token issuances by BANCO ATLÁNTIDA EL SALVADOR, S.A. are backed by the technology of BANCO ATLÁNTIDA EL SALVADOR, S.A., a Digital Asset Service Provider (PSAD) authorized by the National Commission on Digital Assets (CNAD).

For the operation and technical administration of the issuance, BANCO ATLÁNTIDA EL SALVADOR, S.A. utilizes its own platform, ensuring a secure and efficient digital environment for the management of digital assets.

The platform operates on the Algorand *blockchain*, ensuring security, transparency, and efficiency in the issuance, trading, and custody of digital assets, in line with regulatory standards and market best practices.

1. Blockchain Infrastructure and Security

ATLÁNTIDA01 tokens are built on the Algorand blockchain, a network recognized for its high speed, scalability, and advanced security. The key benefits of this technology include:

- Low transaction fees, which optimize returns for investors.
- Fast confirmation times, ensuring efficient transactions without delays.
- A Proof-of-Stake (PoS) consensus mechanism, which enhances the sustainability and decentralization of the ecosystem.
- Automated smart contracts, which manage the economic rights derived from the company's active operations, ensuring the enforcement of rules established at the time of issuance.

2. Secure Identity Management and Compliance

To ensure compliance with Know Your Customer (KYC) and Anti-Money Laundering (AML) regulations, BANCO ATLÁNTIDA EL SALVADOR, S.A., S.A. implements advanced security protocols:

- A decentralized digital identity (DID) system, which validates the identity of investors and participants in the issuance.
- AES-256 encryption to protect private keys and user credentials.
- Monitoring of email addresses using risk analysis tools to prevent suspicious transactions and ensure the integrity of digital assets.

These processes ensure that only properly verified investors can acquire and trade **ATLÁNTIDA01** tokens, thereby strengthening the transparency and security of the ecosystem.

3. Creation and Management of Digital Wallets

The issuance and management of ATLÁNTIDA01 tokens are carried out through internal digital wallets within the BANCO ATLÁNTIDA EL SALVADOR, S.A., S.A. platform, following a secure process based on the following steps:

- Generation of a unique *blockchain* address and private key.
- Encryption of the private key using AES-256, ensuring the protection of digital assets.
- Storage in certified key vaults, minimizing the risk of unauthorized access.
- Destruction of the unencrypted private key in memory, reducing vulnerabilities.
- These measures guarantee the security and traceability of every digital asset within the ecosystem.

4. Disaster Recovery and Business Continuity Plan

To mitigate technological risks, BANCO ATLÁNTIDA EL SALVADOR, S.A., S.A. has a Disaster Recovery Plan (DRP) that ensures the uninterrupted operation of the platform in the event of technological failures or critical incidents. Among the strategies implemented are:

- Automatic backups and data replication across multiple secure servers.
- Contingency plans in the event of cyberattacks or operational disruptions.
- Rapid response protocols, with defined roles and procedures to ensure service continuity.

This infrastructure enables all transactions involving ATLÁNTIDA01 tokens to be conducted

with confidence and stability, minimizing the risk of disruption.

5. Validation and Monitoring Mechanisms

BANCO ATLÁNTIDA EL SALVADOR, S.A. manages a digital ecosystem through which every transaction involving ATLÁNTIDA01 tokens is recorded in a traceable and verifiable manner in near real time, contributing to the proper allocation and management of the credit rights derived from the issuance in favor of investors. Among its key functions are:

- Regulatory oversight in accordance with CNAD regulations.
- Validation of each transaction on the Algorand blockchain prior to its final execution.
- Auditable recording of all transactions,

v. Token Structure and General Information

The following details specific information regarding the structure and functionalities of the ATLÁNTIDA01 token issued to finance BANCO ATLÁNTIDA EL SALVADOR, S.A.

1. **Based on Algorand Smart Contracts (ASC1):** ATLÁNTIDA01 tokens will adhere to the native Algorand Smart Contracts standard, ensuring security, efficiency, and compatibility with the Algorand *blockchain* infrastructure.
2. **Restricted Transfers:** Token transfers are subject to conditions predefined in the smart contracts, such as approval by verified identities, ensuring that only compliant participants can transfer or hold tokens.
3. **On-chain identity management:** The tokens are linked to a KYC/AML verification system implemented on the BANCO ATLÁNTIDA EL SALVADOR, S.A. platform, ensuring users' regulatory compliance and the traceability of transactions.
4. **Decentralized validation system:** Smart contracts incorporate mechanisms that automatically verify whether transactions comply with established rules, including identity validation and transfer restrictions.
5. **Compliance by design:** The issuance protocol prioritizes regulatory compliance by integrating controls directly into the smart contracts, ensuring that all transactions adhere to applicable regulations.
6. **General regulatory controls:** ATLÁNTIDA01 tokens comply with applicable securities regulations, including anti-money laundering (AML) and Know Your Customer (KYC) measures, ensuring a secure and regulated environment.
7. **Modular smart contracts:** The smart contracts used enable the management of multiple aspects of the tokens, such as issuance, transfer rules, and jurisdictional restrictions, ensuring flexibility in supply management.
8. **Advanced management features:** ATLÁNTIDA01 tokens offer additional functionalities beyond standard contracts, such as setting temporary locks, managing the token supply, and defining specific offering rules, such as per-investor limits or geographic restrictions.
9. **Token recovery:** The protocol includes a token recovery feature at to ensure the protection of

assets in the event of loss of access to private keys, providing additional security for investors.

10. **Secure Infrastructure:** The tokens reside in a secure infrastructure based on secure multi-party computation (MPC) systems, ensuring the protection of private keys and the integrity of transactions.

w. Data Governance

Confidentiality and Handling of Inside Information

The parties involved in this offering agree that all **privileged information** related to the structuring, placement, and administration of the ATLÁNTIDA01 debt tokens will be treated with the highest degree of **responsibility, discretion, and confidentiality**.

Such information shall be used solely for the purposes and objectives of this offering, and participants shall refrain from disclosing, reproducing, or using it for any other purpose, whether for their own benefit or that of third parties.

Furthermore, participants undertake to adopt the necessary technical, legal, and organizational measures to ensure the **protection, integrity, and proper use** of inside information, preventing unauthorized access and mitigating any risk of leakage or misuse. For further information, see Annex IV: **Policy on the Use of Inside Information**.

Conclusion: A Robust and Secure Ecosystem

BANCO ATLÁNTIDA EL SALVADOR, S.A. is positioned as one of the leading platforms for digital asset management in El Salvador, combining security, advanced technology, and regulatory compliance to ensure investor confidence in the issuance of the ATLÁNTIDA01 token. For the operation and technical management of the issuance, BANCO ATLÁNTIDA EL SALVADOR, S.A. utilizes a platform that ensures an efficient infrastructure for the issuance, trading, and custody of digital assets.

The combination of the Algorand *blockchain*, advanced security protocols, and strict regulatory compliance reinforces the strength of the issuance, ensuring that the investment is managed with maximum efficiency, transparency, and protection for investors.

9. USE OF FUNDS

A. Use of Funds

The funds obtained from the sale of Debt tokens (ATLÁNTIDA01) will be allocated to back and finance active operations, as well as for funding, liquidity, or other permitted banking

purposes of BANCO ATLÁNTIDA EL SALVADOR, S.A., in accordance with its growth strategy and risk profile.

Additionally, the issuance contributes to strengthening the financing structure of BANCO ATLÁNTIDA EL SALVADOR, S.A., by optimizing the use of opportunities offered by the Digital Asset Issuance Law (LEAD) and El Salvador's regulatory environment, with the aim of attracting investment, diversifying funding sources, and supporting the development of the financial system.

This issuance aims to provide investors with the opportunity to participate, through debt instruments, in the financing of active operations as well as for funding matching, liquidity, or other permitted banking purposes, with a focus on sustainability, economic development, and high social impact.

B. Use of Funds by Tranche

The issuance of ATLÁNTIDA01 debt tokens will follow a tranche-based placement program. Each placement tranche will be reported via a notice to the CNAD and published on the issuer's and certifier's websites.

For each tranche of the issuance, the Issuer must specify in the corresponding placement notice, at a minimum, the opening date, closing date, target amount, minimum placement amount, and conditions applicable to the release of funds.

The funds received from the placement of each tranche will be deposited into the issue's operating account and may only be released to the Issuer once the conditions established for that tranche have been met, including reaching the minimum placement amount, the Issuer's formal request, and the corresponding internal authorization in accordance with its policies and competent bodies.

The Issuer must record the funds received and released for each tranche separately and in an identifiable manner, in accordance with applicable accounting and banking regulations, maintaining sufficient traceability regarding their receipt, release, and use.

The Issuer must inform investors, through the means provided for in this Material Information Document, regarding the opening, closing, amount placed, release of funds, and general use of the proceeds corresponding to each tranche.

No placement tranche of the offering may exceed the maximum authorized term of the offering or have a maturity date later than the maximum term of 120 months.

The Notice of Tranche for the offering must include at least the amount, number of tokens, opening and closing dates, term, rate, type of rate, payment frequency, maturity, amortization,

offering price, repurchase option, payment mechanism, and restrictions.

c. Strategic Objectives of the Issuance

1. Predefined Return and Security

- To offer an investment alternative with periodic interest accrual; interest payments will be made in accordance with the terms agreed upon for each issued tranche; however, partial payments of principal and/or interest may be made in accordance with the Offering Notice for each tranche and applicable documents. Before making such a payment, the issuer will take into account its financial stability and any outstanding obligations.
- Ensure financial security through a contractual obligation document consisting of a Master Debt Acknowledgment Agreement, prioritizing the fulfillment of debt obligations.
- Structure a regulated model that ensures transparency and traceability in payments.

2. Optimization of the financial structure:

- Improve the program's liquidity by optimizing its financing and ensuring execution aligned with strategic objectives.

3. Ensuring transparency and security:

- Implement blockchain technology to record all transactions, ensuring traceability, immutability, and trust for investors.

4. Access to secondary markets:

- Allow tokens to be traded on secondary markets from the start of the issuance, but within the Banco Atlantida El Salvador, S.A. platform, providing greater flexibility and liquidity to investors.

5. Cost Efficiency and Reduction of Intermediation:

- Minimize administrative and operational costs associated with traditional financing models, allowing a greater percentage of the funds raised to be allocated to the issuer's active operations.

6. Leveraging the regulatory environment:

- Maximizing the benefits of El Salvador's regulatory framework, establishing the Public Offer for Asset-Backed Debt Issuance as a reliable and efficient financing alternative.

ATLÁNTIDA01 token issuances represent an innovative opportunity for investors seeking to participate in an innovative form of financing, backed by a solid and transparent financial structure. Furthermore, it contributes to the country's economic growth through the modernization of the financial sector and the adoption of advanced financial technologies.

Internal Control of Fund Management

To ensure the efficient and transparent management of funds raised through the issuance of ATLÁNTIDA01 tokens, BANCO ATLÁNTIDA EL SALVADOR, S.A. will implement an internal control framework aligned with best financial and regulatory practices:

Deposit and Custody of Funds

The funds raised will be deposited into segregated accounts under the issuer's control and subject to external audits, ensuring transparent and secure management.

These funds may only be used to fulfill the objectives of the issuance, as stipulated in the Relevant Information Document (DIR).

Authorization System

All disbursements will require approval from at least one hierarchical level within the organization, including the Finance Manager and/or Legal Representative.

Each transaction must be supported by documentation justifying its purpose and alignment with the issuance's objectives.

Supervision by the Issuance Administrator

The issue administrator, authorized by the National Commission on Digital Assets (CNAD), will oversee the use of the funds and ensure their proper application.

Quarterly reports will be issued and shared with investors and regulatory authorities.

Periodic External Audits

The General Shareholders' Meeting of BANCO ATLÁNTIDA EL SALVADOR, S.A. will annually appoint an independent auditing firm to conduct periodic reviews of the administration and use of the funds.

The objectives of these audits will be:

To verify compliance with the issuance guidelines and the proper use of the funds.

To ensure transparency and regulatory compliance.

To oversee the proper implementation of internal control policies.

Document Management System

All financial transactions and decisions related to the issuance will be documented in both digital and physical formats, ensuring traceability and controlled access to key information.

The information will be stored on secure platforms, with access restricted to authorized stakeholders.

Regulatory Compliance

BANCO ATLÁNTIDA EL SALVADOR, S.A. will ensure that all internal control mechanisms comply with: The provisions of the National Commission on Digital Assets (CNAD).

Applicable local and international regulations.

Globally recognized auditing and financial control standards.

These integrated internal control mechanisms reinforce trust and transparency in the management of funds, ensuring that they are used effectively and in accordance with the objectives of the issuance.

D. PARTIES INVOLVED IN THE ISSUANCE

PARTICIPANTS	
Issuer	BANCO ATLÁNTIDA EL SALVADOR, S.A. 1st Poniente Street and Constitución Boulevard #3510, Escalón Neighborhood, San Salvador. https://www.bancoatlantida.com.sv/ Contact Phone Number: +503 2223-7676 Registration Number CNAD-EAD-0053
Digital Asset Services Provider	BANCO ATLÁNTIDA EL SALVADOR, S.A. 1st West Street and Constitución Boulevard #3538, Escalón Neighborhood, San Salvador. https://www.bancoatlantida.com.sv/ Contact Phone Number: +503 2223-7676 CNAD Registration Number – PSAD-0035. BANCO ATLÁNTIDA EL SALVADOR, S.A. acts as a registered Digital Asset Service Provider (PSAD), ensuring the proper management and custody of the tokens issued under this offering. For the operational execution of the issuance and administration of the digital assets, BANCO ATLÁNTIDA EL SALVADOR, S.A., acting as a Digital Asset Service Provider (PSAD), has implemented a specialized technological infrastructure that provides the platform for the issuance, trading, and management of the digital assets.
Legal Counsel	BANCO ATLÁNTIDA EL SALVADOR, S.A. 1st Poniente Street and Constitución Boulevard #3538, Escalón Neighborhood, San Salvador. https://www.bancoatlantida.com.sv/ Contact Phone Number: +503 2223-7676 CNAD Registration Number – PSAD-0035.
Digital Asset Certifier	TR Capital, S.A. de C.V. Address: Calle Cuscatlán, #4312, Col. Escalón, San Salvador, El Salvador. Website: https://www.trcapital.net/ CNAD Registration Number: CERT-0003 Designated Contact Person: Héctor Ramón Torres Córdova Contact Phone Number: +503 2538-6360 Contact email: info@trcapital.net

Issue Arranger	BANCO ATLÁNTIDA EL SALVADOR, S.A. 1st Street West and Constitución Boulevard #3538, Escalón Neighborhood, San Salvador. Contact phone number: +503 2223-7676 https://www.bancoatlantida.com.sv/ CNAD Registration Number – PSAD-0035
External Auditor	Auditores y Consultores de Negocios, S.A. de C.V. Calle 1, No. 113, between Calle La Mascota and Calle Loma Linda, Colonia San Benito, San Salvador Centro. https://www.bakertilly.com.sv /Designated Contact Person: Otto Karím Guzmán Barrera Contact phone numbers: +503 2556 0505 Contact email: otto.guzman@bakertilly.com.sv

Supervision and Control Policy

Internal policies of the PSAD or Issuer that ensure the supervision and control of the issuance.

Annex VI—PSAD Policies.

To ensure transparency, security, and efficiency in the issuance of ATLÁNTIDA01 tokens, BANCO ATLÁNTIDA EL SALVADOR, S.A. has implemented a set of rigorous policies and procedures that reinforce its commitment to the financial and operational integrity of the program.

Policies for the Prevention of Money Laundering and Terrorist Financing

All investors, both individual and institutional, must complete a “Know Your Customer (KYC)” verification process before participating in the token issuance. Ongoing verification processes will be conducted to keep investor information up to date, in accordance with the policies on the Prevention of Money Laundering, Terrorist Financing, and Proliferation Financing.

External Audit of Financial Statements

Independent annual audits will be conducted by an accredited external firm to ensure the integrity and accuracy of the financial statements. The audit reports will be publicly available on the PSAD platform (BANCO ATLÁNTIDA EL SALVADOR, S.A.), reinforcing transparency and accountability.

For the information of investors, the audited financial statements for the years 2023, 2024, and 2025 are attached as appendices, as well as the financial statements of Banco Atlántida El Salvador, S.A. as of March 2026.

Re-Certification of the Issuance

The issuance will be certified by a certifier authorized by the National Commission on Digital Assets (CNAD) at least once a year. This recertification will include verification of the continuity

of the contracts and agreements underpinning the FFFs, ensuring the validity of the underlying cash flows.

Token Security and Cybersecurity

Annual penetration tests will be conducted to identify and mitigate vulnerabilities in PSAD's security systems, thereby preventing potential attacks. Any detected vulnerabilities must be remedied within a maximum of 30 business days, ensuring the security of the tokens and the technological infrastructure.

Corporate Governance of the Issuer

The Issuer is committed to strict compliance with local and international regulations regarding financial transparency and good corporate governance. In the event of a material occurrence that impacts the FFFs, the Issuer will notify investors within 5 business days of becoming aware of the occurrence.

Hiring Policy

Details regarding the hiring of individuals and legal entities involved with BANCO ATLÁNTIDA EL SALVADOR, S.A. are set forth in **Annex VI—Issuer's Policies**.

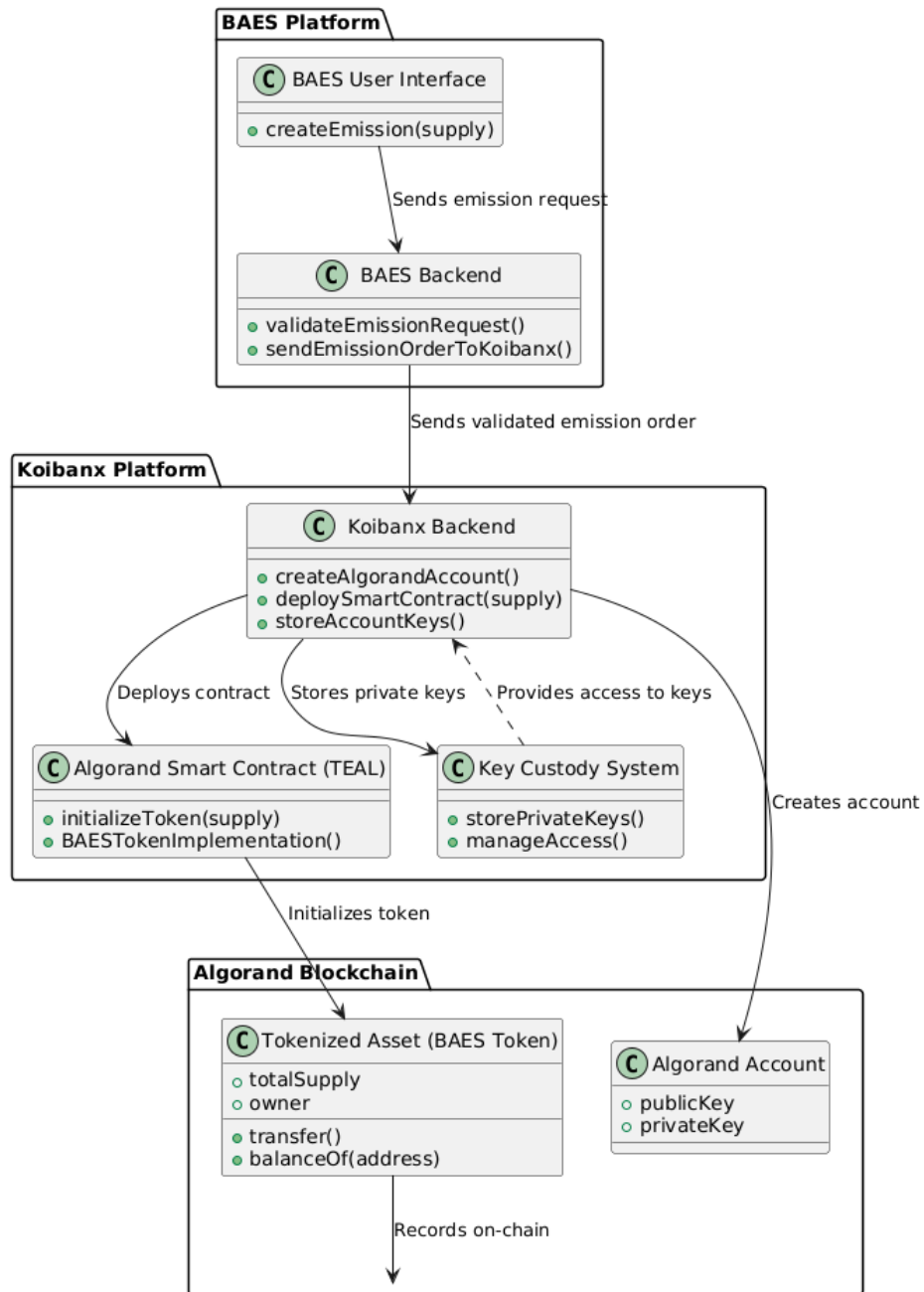
Privacy Policies

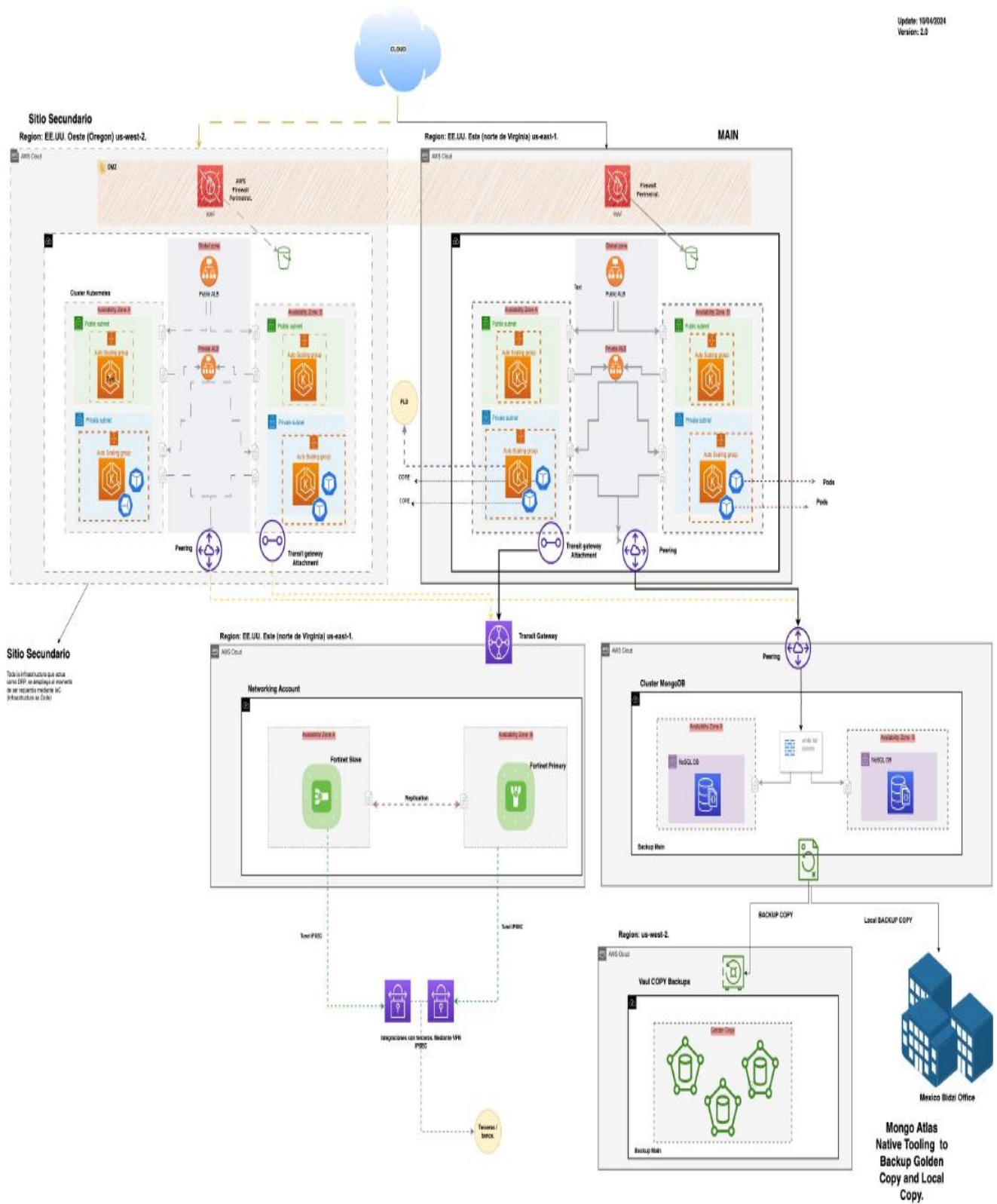
Investors' personal information will be treated confidentially and securely, in compliance with established privacy policies. These policies will be available through the PSAD platform (BANCO ATLÁNTIDA EL SALVADOR, S.A.).

Code of Ethics and Additional Policies

The Issuer adheres to a Code of Ethics that includes strict policies for the prevention of money laundering, terrorist financing, and illicit activities.

10. TOKEN FLOW WITHIN THE TRADING PLATFORM





A. Underlying Technology and Standards

The issuance of ATLÁNTIDA01 tokens by BANCO ATLÁNTIDA EL SALVADOR, S.A. is based on an advanced technological infrastructure that combines security, transparency, and regulatory compliance, leveraging *blockchain* technologies, cloud services, and specialized tools. This architecture ensures the integrity of the process for issuing, trading, and managing digital assets:

1. **Interface (Traffic Management and Security):** The interface uses a global distribution system that optimizes platform performance and protects against cyber threats. A firewall is implemented that enforces industry-standard security rules, ensuring the availability and protection of the infrastructure.
2. **Application Layer (Request Processing and Authentication):** Request management is handled by serverless functions that process transactions, validate data, and manage tokens on the *blockchain*. These functions are exposed via a secure API and complemented by authentication systems for users and services, ensuring controlled access to the platform.
3. **Blockchain (Algorand):** ATLÁNTIDA01 tokens are issued on the Algorand *blockchain*, an energy-efficient network based on the Pure Proof of Stake (PPoS) protocol. This *blockchain* ensures fast, cost-effective, and decentralized transactions while maintaining high standards of security and transparency.
4. **Algorand Smart Contracts (ASC1) Protocol:** This standard enables the issuance and management of digital assets directly on the *blockchain*. ASC1 smart contracts ensure traceability, regulatory compliance, and process automation, such as the payment of principal and interest and the validation of transfers.
5. **Digital Identities on the Blockchain:** Each token is linked to a digital identity management system integrated into the platform, which enables identity verification (KYC/AML). This ensures that all transactions are carried out by verified users, strengthening regulatory compliance.
6. **Transaction Monitoring (Chainalysis):** *Blockchain* analysis technology is used to monitor the addresses associated with transactions. This system identifies and blocks suspicious activity, ensuring compliance with anti-money laundering (AML) regulations and strengthening the security of the ecosystem.
7. **Cloud Infrastructure (AWS):** The platform operates on the Amazon Web Services (AWS) cloud, which provides scalability, high availability, and security for the program's data. This ensures service continuity and data integrity.
8. **KYC and AML:** Investor identity verification is managed through the KYC/AML system

integrated into the BANCO ATLÁNTIDA EL SALVADOR, S.A. platform, ensuring that all users comply with legal and regulatory requirements.

9. **Private Key Protection (MPC):** The private keys backing the tokens are protected using secure multi-party computation (MPC) technology, which distributes the keys among multiple parties to avoid single points of failure and protect assets against potential attacks.

10. **Token and Transaction Management:** Smart contracts and the technological infrastructure enable the management of key aspects such as token supply, transfer restrictions, monitoring of regulatory rules, and the eventual burning of tokens.

B. Transfer Restrictions Due to KYC/AML Compliance, Sanctioned Jurisdictions, and Operational Controls

The acquisition, holding, trading, transfer, redemption, or any other disposition of Digital Assets shall be subject to ongoing compliance with the policies, procedures, and controls of the Issuer and/or the Digital Asset Service Provider, as applicable, regarding know-your-customer, due diligence, and the prevention of money laundering, terrorist financing, and the financing of the proliferation of weapons of mass destruction (ML/TF/WPMD), as well as applicable legal, regulatory, prudential, and operational provisions.

1. Identification, Verification, and Due Diligence Requirements

Only those individuals or legal entities that have satisfactorily completed the identification, verification, know-your-customer, and due diligence processes required by the Issuer and/or the relevant Digital Asset Service Provider (PSAD) may acquire, hold, transfer, or receive Digital Assets.

Such processes may include, among others:

- Identification of the beneficial owner or ultimate beneficiary;
- Documentary and/or electronic verification of identity;
- Validation of corporate information, in the case of legal entities;
- Determination of the investor's transactional and economic profile;
- Analysis of the source and destination of funds;
- Risk assessment of the customer, counterparty, wallet, or jurisdiction;
- Ongoing transaction monitoring; and
- Application of simplified, standard, or enhanced due diligence measures, as appropriate.

Failure to comply, refusal, misrepresentation, insufficiency, or outdated information regarding the required details may result in the suspension, limitation, rejection, or blocking of the transaction or the corresponding wallet.

2. Restrictions for Sanctioned, Prohibited, or High-Risk Jurisdictions

The acquisition, transfer, receipt, trading, redemption, or disposal of Digital Assets will not be permitted when the transaction directly or indirectly involves jurisdictions, territories, persons, entities, wallets, platforms, or counterparties subject to sanctions, embargoes, regulatory restrictions, or equivalent measures imposed by competent domestic or foreign authorities, international organizations, or watchlists recognized by the Issuer and/or the PSAD.

Likewise, the Issuer may restrict or deny transactions related to jurisdictions considered high-risk in terms of AML/CFT/PADM, strategic supervisory deficiencies, corporate opacity, sanctions evasion, lack of international cooperation, reputational risk, or regulatory risk.

3. Whitelists, Blacklists, and Wallet Validation

The Issuer may implement control mechanisms based on allowlists, restricted lists, internal lists, external lists, eligibility rules, and transactional analysis or *blockchain* analytics tools.

In particular, the following mechanisms may be used:

- **Whitelist:** a registry of investors, wallets, addresses, accounts, or counterparties previously approved to trade in Digital Assets.
- **Blacklist:** a registry of investors, wallets, addresses, counterparties, platforms, or jurisdictions for which there is a prohibition, restriction, alert, match with sanctions lists, high risk, or indication of unusual or illicit activity.
- **Monitoring lists:** internal or external records used to apply additional controls, enhanced due diligence, manual review, transaction limits, or prior approval.

4. Blocking, Suspension, Rejection, or Operational Reversal of Transactions

The Issuer may, without liability to the investor, reject, suspend, limit, block, withhold, freeze, or prevent the execution of any transaction related to Digital Assets when, in its reasonable discretion and in accordance with its internal policies, any of the following circumstances exist:

- Failure to comply with KYC, KYB, due diligence, or information update requirements;
- Full or partial match with sanctions, restrictive, or control lists;
- Direct or indirect involvement of sanctioned, prohibited, or high-risk jurisdictions;
- Indications, red flags, or suspicions of ML/TF/PADM, fraud, sanctions evasion, market abuse, identity theft, or illicit activity;
- Use of wallets, platforms, protocols, or services that pose operational, technological, regulatory, or reputational risks;
- Inconsistencies between the investor's stated profile and their trading behavior;
- Orders, instructions, requirements, or measures issued by a competent authority;
- Technological failures, cybersecurity incidents, vulnerabilities, or risks to the integrity of the offering;
- Non-compliance with the terms and conditions of the offering, the DIR, the applicable contract, or current regulations; or
- Any other circumstance that, in accordance with applicable law, internal policies, or the

comprehensive risk management of the Issuer and/or PSAD, justifies the adoption of preventive or corrective measures.

5. Freezing or Immobilization Due to Legal or Regulatory Instructions

Digital Assets, wallets, balances, records, or associated rights may be subject to freezing, immobilization, blocking, or restriction when required by a competent authority, including judicial, administrative, regulatory, financial supervisory, anti-money laundering authorities, or any other authority with legal jurisdiction.

In such cases, the Issuer (PSAD) will act in accordance with the order or request received and may refrain from notifying the investor in advance when required to do so by applicable law, the nature of the investigation, or the authority's instruction.

6. Continuous Monitoring and Post-Trade Review of Transactions

Transactions involving Digital Assets will be subject to continuous monitoring before, during, and after their execution. Such monitoring may include manual, automated, technological, or *blockchain* analytics tools designed to detect unusual transactions, atypical patterns, links to high-risk addresses, profile inconsistencies, transaction fragmentation, circular transactions, exposure to restricted jurisdictions, or other risk indicators.

The initial approval of an investor, wallet, or transaction will not limit the Issuer's and/or the PSAD's authority to conduct subsequent reviews, request additional information, reclassify the investor's risk, restrict future transactions, or take corrective measures.

7. Investor's Obligation to Maintain Up-to-Date Information

Holders, purchasers, and investors of Digital Assets are obligated to keep the information provided to the Issuer and/or the PSAD up to date, including identification data, address, economic activity, beneficial owner, source of funds, jurisdiction of residence, tax status, transaction profile, wallets used, and any other required information.

Failure to update information in a timely manner may be considered sufficient grounds to limit, suspend, block, or reject transactions related to Digital Assets.

8. Procedure for Updating Restrictions, Lists, and Policies

The Issuer may at any time update, modify, expand, or replace its policies, procedures, permitted lists, restricted lists, eligibility criteria, KYC/AML controls, monitoring rules, transaction limits, and operational restrictions applicable to Digital Assets.

Such updates may be made, among other circumstances, when:

there is a change in legislation, regulation, technical standards, or criteria established by a competent authority;

- Sanctions, restrictive, or high-risk lists are updated;
- new technological, operational, regulatory, reputational, or ML/TF/PADM risks are

identified;

- the risk profile of an investor, wallet, counterparty, platform, or jurisdiction changes;
- Vulnerabilities, incidents, unusual patterns, or emerging typologies are detected;
- It becomes necessary to preserve the integrity, security, traceability, or regulatory compliance of the issuance; or
- It is required by the internal policies of the issuer, the PSAD, or the financial group to which they belong.

Updates may be communicated through the electronic, contractual, operational, or informational channels that the Issuer and/or the PSAD have established. Unless applicable regulations require a specific timeframe or mechanism, such updates may take effect upon their publication, notification, or operational implementation.

9. Investor Acceptance of Restrictions

The acquisition, holding, transfer, or any transaction involving the Digital Assets implies the investor's or holder's express and irrevocable acceptance that their transactions will be subject to the controls, restrictions, validations, blocks, rejections, suspensions, and updates described in this DIR, as well as to internal policies, terms and conditions, applicable contracts, and current regulations.

The investor acknowledges that the purpose of the restrictions described is to protect the integrity of the issuance, prevent the misuse of Digital Assets, comply with regulatory obligations, and mitigate legal, operational, technological, reputational, and AML/CFT/PADM risks.

c. Summary of BANCO ATLÁNTIDA EL SALVADOR, S.A.'s Infrastructure for the ATLÁNTIDA01 Issuance

Element	Description
Blockchain Used	Algorand (PPoS)
Smart Contracts	Algorand Smart Contracts (ASC1)
Digital Identity	See Appendix VII—Digital Identity of the Tokens.
Key Security	AES-256-CTR-encrypted keys
Wallet	Database in production, data at rest encrypted with AES-256 (in Mongo Atlas). In transit: HTTPS and TLS 1.2

Management	
Business Continuity	DRP with real-time recovery and data replication
Monitoring	Audit trail, CNAD monitoring, transaction transparency

D. Conclusion

BANCO ATLÁNTIDA EL SALVADOR, S.A. offers a robust and efficient infrastructure for the issuance and management of the **ATLÁNTIDA01** token. Its integration with Algorand, along with advanced cybersecurity measures and a business continuity plan, helps reinforce the reliability of the issuance, offering investors transparency and security in every transaction.

- **Smart Contract Addresses:** The smart contracts can be found in Appendix VII—Digital Identity of the Tokens.
- **Token ID:** See Appendix VII—Digital Identity of the Tokens.
- The issued token has zero (0) decimal places.

11. RISKS ASSOCIATED WITH THE ISSUANCE AND MITIGATION STRATEGIES

The risks described below are intended to inform investors about the potential risks associated with the public issuance of ATLÁNTIDA01 tokens, issued by BANCO ATLÁNTIDA EL SALVADOR, S.A. To address these risks, the Issuer has implemented mitigation strategies aimed at reducing their impact and strengthening the stability and sustainability of the issuance.

These strategies will take effect as of the issuance date of the Relevant Information Document (DIR) and will be subject to continuous improvement throughout the life of the ATLÁNTIDA01 token, as part of the Issuer's efforts to optimize its operations and ensure the protection of investors' interests.

Additionally, the Issuer will maintain an ongoing commitment to compliance with applicable banking and digital asset regulations, the disclosure of relevant financial information, the submission of periodic reports required by the competent authorities, the timely notification of material events, and compliance with prudential limits and other applicable regulatory

requirements, with the aim of promoting transparency, soundness, and the proper functioning of the issuance.

It should be noted that the risk assessment presented by the Issuer does not replace the individual investment analysis that each investor must conduct, which should be based on their risk profile and financial objectives.

VII. Risks Associated with the Issuer

1. Risk of Changes in Legislation

- **Description:** Changes in legislation, particularly regarding tax matters or the regulation of digital assets, may negatively affect the issuer's future cash flows and the performance of the ATLÁNTIDA01 token offering.
- **Mitigation:** Maintain a specialized legal, regulatory, and tax advisory team that continuously monitors regulatory changes applicable to the issuer and the offering.
 - **Action to be taken:** Establish an action plan to promptly adjust the issuer's policies, processes, and practices to comply with applicable regulatory provisions, thereby minimizing the financial and operational impact of regulatory changes.

2. Risk of Judicial, Administrative, and Regulatory Proceedings

- **Description:** Judicial, administrative, regulatory, or arbitration proceedings could affect the issuer's operational, financial, or reputational stability. Furthermore, sanctions, observations, or requirements issued by competent authorities could impact its operations or results.
- **Mitigation:** Maintain adequate legal and compliance management, supported by specialized advisors and the implementation of corporate governance, internal control, and regulatory monitoring practices.
 - **Action to be taken:** Conduct periodic legal and compliance reviews, and maintain internal protocols for the timely handling and follow-up of contingencies, regulatory requirements, or conflicts that may arise.

3. Risk of Money Laundering, Terrorist Financing, and Proliferation of Weapons of Mass Destruction

- **Description:** There is a risk that tokens could be used for illicit activities if adequate controls to prevent money laundering, terrorist financing, and the proliferation of weapons of mass destruction are not implemented.
- **Mitigation:** Maintain policies, procedures, and controls for due diligence, know-your-customer (KYC), transaction monitoring, and applicable regulatory compliance, given that the issuer is a banking entity regulated and supervised by the competent authorities.
 - **Action to Be Taken:** Implement mechanisms for customer identification and onboarding, transaction monitoring, due diligence, and periodic compliance reviews to strengthen the prevention, detection, and management of potential illicit activities related to the issuance.

4. Operational Risk

- **Description:** Potential failures in operational processes, technology platforms, information systems, or internal control mechanisms may affect the issuer's ability to properly manage its operations and meet its obligations in a timely manner.
- **Mitigation:** Maintain robust internal controls, documented operational procedures, risk management frameworks, and business continuity mechanisms, in compliance with applicable banking and regulatory standards, as well as the supervisory requirements established by the competent authorities.
 - **Action to Be Taken:** Conduct periodic internal audits, continuously monitor critical processes, and perform business continuity tests to strengthen the efficiency of controls and the issuer's technological and operational resilience.

5. Corporate Governance Risk

- **Description:** Situations that affect corporate governance mechanisms, strategic decision-making, or proper coordination among governing bodies could impact the issuer's management and stability.
- **Mitigation:** Maintain corporate governance practices aligned with applicable banking and regulatory standards, as well as formal mechanisms for decision-making and the resolution of disputes among the parties involved.
 - **Action to Be Taken:** Have up-to-date corporate governance policies, regulations, and procedures, as well as dispute resolution mechanisms and monitoring by the relevant governing bodies.

6. Systemic Risk

- **Description:** Macroeconomic, financial, or market factors—such as inflation, changes in interest rates, an economic slowdown, or changes in financial system conditions—could affect the issuer's financial performance and its ability to achieve projected results.
- **Mitigation:** Continuously monitor the economic and financial environment and maintain adequate risk management and financial planning to respond promptly to changes in market conditions, in compliance with applicable banking and regulatory requirements.
 - **Action to be taken:** Conduct periodic analyses of relevant macroeconomic and financial variables, incorporating stress scenarios and impact assessments to support decision-making and prudent risk management.

7. Banking Liquidity Risk

- **Description:** Financial stress events affecting the banking system or the industry as a whole could impact the Bank's availability of liquid funds and its ability to meet its obligations in a timely manner.
- **Mitigation:** Maintain active liquidity management, diversified funding sources, and internal monitoring controls, in compliance with applicable banking regulations and prudential limits.
 - **Action to Be Taken:** Periodically monitor regulatory liquidity indicators at the institutional and industry levels, as well as projected liquidity needs under various scenarios.

8. Risk of Deterioration and Delinquency in the Loan Portfolio

- **Description:** A deterioration in the quality of the Bank's loan portfolio could lead to higher

levels of delinquency, loan loss provisions, and credit losses, affecting its financial results and capital position.

- **Mitigation:** Maintain prudent policies for loan origination, analysis, monitoring, classification, and collection, in accordance with applicable banking regulations.
 - **Action to Be Taken:** Periodically monitor delinquency levels, coverage ratios, provisions, loan portfolio quality, and the performance of the main loan segments.

9. Portfolio Concentration Risk

- **Description:** A significant concentration of credit exposures, deposits, or revenue in certain customers, economic groups, sectors, or products could increase the impact of adverse events on the Bank's financial results.
- **Mitigation:** Maintain portfolio diversification policies and procedures, internal and concentration limits, and monitoring of relevant exposures, in compliance with applicable prudential limits.
 - **Action to Be Taken:** Periodically monitor concentrations by client, economic group, sector, product, and revenue source, and evaluate potential mitigation measures as appropriate.

10. Funding Risk

- **Description:** Changes in market conditions, increases in funding costs, or limitations on access to funding sources could affect the Bank's ability to obtain the resources necessary for the normal conduct of its operations.
- **Mitigation:** Maintain policies and procedures for diversifying funding sources, managing maturities, and financial planning, in compliance with applicable banking regulations.
 - **Action to Be Taken:** Continuously monitor financing needs, the composition of funding sources, relevant maturities, and market conditions that could affect access to funds.

11. Unsecured Debt Risk

- **Description:** The tokens represent unsecured obligations of the Bank; therefore, they are not backed by specific collateral or preferential rights over specific assets. Consequently, investors will have the same rights to repayment as the Bank's other unsecured creditors, in accordance with applicable law.
- **Mitigation:** The issuance is carried out by Banco Atlántida El Salvador, S.A., an entity regulated and supervised by the competent authorities, subject to compliance with prudential, capital, and risk management requirements.
 - **Action to Be Taken:** Maintain compliance with applicable regulatory, financial, and capital adequacy indicators, and periodically disclose relevant financial information to investors.

E. Risks Associated with the Digital Asset Offering

1. Market Acceptance Risk

- **Description:** There is a possibility that the offering may not be well received by investors, which could hinder or slow down the placement of ATLÁNTIDA01 tokens.

- **Mitigation:** Develop a marketing and outreach strategy that clearly communicates the characteristics, risks, and benefits of the offering, supported by market analysis and the issuer's commercial experience.
 - Action to Be Taken: Conduct market analysis and monitor the interest of potential investors, as well as carry out outreach and communication activities aimed at facilitating understanding of the offering and its characteristics.

2. Security Risk

- **Description:** Vulnerabilities in the technological infrastructure could be exploited by attackers, compromising the integrity of the offering.
- **Mitigation:** Maintain cybersecurity controls, continuous monitoring, access management, and appropriate technological protection mechanisms, in compliance with applicable regulations and the security policies implemented by the issuer and the providers involved in the operation.
 - Action to Be Taken: Conduct periodic security assessments, vulnerability tests, and audits of the technological infrastructure used in the offering, as well as maintain incident response procedures and continuous monitoring of critical systems.

3. Secondary Market Liquidity Risk

- **Description:** There is a risk that investors may face difficulties in selling or transferring their tokens at the desired time due to limited trading activity in the markets authorized for the trading of digital assets.
- **Mitigation:** Encourage the participation of investors who contribute to the development of an active secondary market for the offering.
 - Action to Be Taken: Continuously monitor the trading conditions of the offering and coordinate actions aimed at strengthening activity in the primary and secondary markets authorized for trading the tokens.

4. Risk of Technology Adoption

- **Description:** Investors may have limited knowledge of *blockchain* technology, digital assets, and the mechanisms associated with their trading and custody, which could affect their willingness to participate in the offering.
- **Mitigation:** Provide clear and accessible information about the characteristics of digital assets, as well as support channels to help users understand the issuance process and the technology used.
 - Action to be taken: Conduct outreach activities on how digital assets work and maintain support channels to address inquiries related to the issuance and their operation.

5. Transparency Risk

- **Description:** Insufficient disclosure or the perception of a lack of relevant information regarding the offering could affect investor confidence and their ability to adequately assess the risks and characteristics of the tokens.
- **Mitigation:** Maintain timely and transparent disclosure practices regarding the offering and the issuer, in accordance with applicable regulations and the disclosure requirements

established by the competent authorities.

- Action to Be Taken: Periodically publish financial and operational information, as well as any material events related to the offering, ensuring that investors have sufficient information to make informed decisions.

6. Risk of Technical Failures

- **Description:** Failures in the systems, technology platforms, or infrastructure used for the issuance, registration, custody, or trading of tokens could cause temporary disruptions in the issuance process and affect the investor experience.
- **Mitigation:** Maintain adequate technological infrastructure, backup mechanisms, continuous monitoring, and business continuity plans to minimize the impact of technological incidents.
 - Action to Be Taken: Conduct periodic performance, capacity, and recovery tests on critical systems, and maintain contingency and business continuity plans to promptly address any technological disruptions.

F. Risks Associated with Digital Assets

1. Volatility Risk

- **Description:** The trading value of digital assets may fluctuate in authorized markets due to changes in market conditions, liquidity levels, interest rates, or investor sentiment, and may differ from their face value or the value expected by holders.
- **Mitigation:** Maintain clear and up-to-date information on the financial characteristics of the issuance, its payment terms, and the associated risks, bearing in mind that the issuance is conducted under an applicable regulatory framework and with conditions previously defined for investors.
 - Action to be taken: Periodically monitor the performance of the issuance in the authorized markets and disclose relevant information that allows investors to adequately assess market conditions and the performance of the tokens.

2. Fraud Risk

- **Description:** There is a possibility of fraud attempts, identity theft, manipulation of information, or unauthorized transactions related to the issuance, transfer, or trading of the tokens.
- **Mitigation:** Maintain due diligence procedures, know-your-customer protocols, transaction monitoring, and internal controls designed to prevent, detect, and manage potential fraud incidents, in compliance with applicable banking and regulatory requirements.
 - Measures to Be Implemented: Conduct periodic internal audits, implement identity verification controls, monitor unusual transactions, and utilize technological tools for fraud prevention and detection implemented by the issuer.

3. Risk of Loss of Private Keys

- **Description:** The loss, exposure, or misuse of private keys associated with digital assets could limit access to, transfer of, or control over the tokens, potentially resulting in losses for their

holders.

- **Mitigation:** Maintain secure custody mechanisms, access management, key protection, and technological controls aimed at reducing the risk of loss, exposure, or unauthorized use, in compliance with applicable regulations and the issuer's security policies.
 - Action to Be Taken: Implement mechanisms for the custody and protection of private keys that incorporate adequate security controls, such as secure access management, activity monitoring, backup procedures, and contingency measures designed to reduce the risk of loss, exposure, or unauthorized use of the keys .
- 4. **Risk of Dependence on Third Parties**
 - **Description:** Dependence on technology providers, external platforms, or critical services related to the issuance, custody, registration, or trading of digital assets could affect the operational continuity of the issuance.
 - **Mitigation:** Maintain processes for the evaluation, contracting, monitoring, and management of critical suppliers, including service level agreements, backup mechanisms, and business continuity plans, in compliance with applicable banking and regulatory requirements.
 - Action to Be Taken: Establish contracts, monitoring controls, and contingency procedures with relevant technology providers, seeking to reduce operational dependence on a single platform or critical service whenever feasible.
- 5. **Interoperability Risk**
 - **Description:** Digital assets may face limitations or challenges when integrating with internal systems, technology platforms, and custody, registration, or trading mechanisms used to operate the issuance.
 - **Mitigation:** Conduct compatibility and technology integration tests and maintain monitoring controls over the systems relevant to the issuance.
 - Action to Be Taken: Ensure technological integration with relevant platforms and conduct interoperability testing on key systems.

G. Risks Associated with the Technology Used

1. Risk of Technical Failures and Technological Continuity

- **Description:** Technical issues with *blockchain* technology, platforms, associated systems, or the infrastructure used could affect the issuance, administration, registration, custody, trading, or accessibility of the tokens for investors.
- **Mitigation:** Maintain testing processes, continuous monitoring, technical support, and contingency plans that enable the timely identification, resolution, and correction of technological failures, in compliance with applicable banking and regulatory requirements.
 - Action to Be Taken: Conduct periodic functional, load, stress, and recovery tests on critical systems, and maintain business continuity and disaster recovery plans with backup mechanisms and procedures for addressing technological incidents.

2. Risk of Security Vulnerabilities

- **Description:** *Blockchain* technology, associated platforms, and systems could be exposed to

vulnerabilities, unauthorized access, cyberattacks, or incidents that compromise the security of digital assets, transactions, or investor information.

- **Mitigation:** Maintain cybersecurity controls, access management, continuous monitoring, authentication, and information protection in accordance with the issuer's internal security policies and applicable regulations.
 - Action to Be Taken: Conduct security audits, vulnerability tests, access monitoring, and periodic reviews of the technology infrastructure, and maintain procedures for responding to cybersecurity incidents.

3. Risk of Technological Obsolescence

- **Description:** The technology used for issuing and managing tokens may require future updates or adjustments to remain operational, secure, and compatible with the evolving digital asset market.
- **Mitigation:** Monitor technological developments in the sector and conduct periodic reviews of the platforms, systems, and processes used, striving to maintain the relevance and security of the technological infrastructure.
 - Action to Be Taken: Conduct periodic technology assessments with relevant internal departments and vendors, identifying updates, improvements, or adjustments necessary to maintain the issuance operation.

4. Risk of Errors in Code or Technology Configuration

- **Description:** Errors in the code, platform configurations, technological parameters, or operational logic used for the issuance and management of tokens could lead to operational problems, inconsistencies in records, or disruptions in the administration of the token issuance.
- **Mitigation:** Conduct technical reviews, pre-deployment testing, and validation checks on the technological components used in the broadcast.
 - Action to be taken: Conduct functional tests, simulations, and technical reviews before implementing significant changes to systems or platforms, and document the corresponding validation and approval processes.

5. Privacy Risk

- **Description:** The technology used for the issuance and management of tokens could expose user or investor information if adequate data protection and confidentiality controls are not implemented.
- **Mitigation:** Maintain data protection, confidentiality, access management, and information security measures in compliance with applicable regulations and the issuer's internal policies.
 - Action to Be Taken: Adopt data protection technologies, such as zk-SNARKs, and conduct periodic regulatory compliance audits.

6. Technology Governance Risk

- **Description:** A lack of clarity regarding the governance of the technology used can lead to operational and update issues.
- **Mitigation:** Establish a clear technology governance framework and update policies.
 - Action to be taken: Create a technology governance committee to oversee system updates, maintenance, and security.

Clarifications:

- It is expressly clarified that payment obligations rest solely with BANCO ATLÁNTIDA EL SALVADOR, S.A., and liability does not extend to shareholders, parent companies, affiliates, or related entities, unless expressly agreed upon.
- The tokens do not constitute bank deposits, savings accounts, checking accounts, or certificates of deposit, and are not covered by deposit insurance or equivalent mechanisms.
- In the event of intervention, resolution, liquidation, revocation of authorization, suspension of operations, or any other administrative, regulatory, or judicial measure affecting the Issuer, the economic rights derived from the ATLÁNTIDA01 tokens shall be subject to the legal regime applicable to banking institutions, including the order of priority of claims, restrictions, procedures, and effects determined by the competent authority.
- The issuance is not backed by any specific, real, fiduciary, and/or pledge guarantees; it will be backed by the Issuer's general assets and the contractual payment obligation assumed by the Bank. Therefore, the obligations arising from ATLÁNTIDA01 will be unsecured, and, unless otherwise required by law or in the case of debt with specific priority, they will be satisfied on an equal footing with the Bank's other unsecured common obligations.

12. COMPLIANCE WITH REGULATORY AND PRUDENTIAL INDICATORS

During the term of the issuance, the Issuer will maintain compliance with the regulatory and prudential requirements and other applicable provisions issued by the Superintendency of the Financial System (SSF), the Central Reserve Bank of El Salvador (BCR), and the Deposit Insurance Institute (IGD), as well as with any other regulatory obligations applicable to banking institutions.

In the event that a non-compliance or deviation from any of the applicable regulatory requirements is identified, the Issuer will promptly notify investors of such event through the appropriate disclosure mechanisms, including a description of the corrective measures and the action plan to be implemented to restore compliance within the applicable timeframes.

Furthermore, the Issuer will keep relevant financial information up to date and will promptly disclose any material event that could significantly affect its financial or operational situation or its ability to meet the obligations arising from this issuance.

Furthermore, the financial model for this issuance incorporates certain financial indicators and metrics used for the purposes of analysis, monitoring, and scenario projection. Reference thresholds are established for these indicators to evaluate the expected performance of the projections and strengthen the financial monitoring of the issuance.

Any deviation from or failure to meet the thresholds or projected values for these indicators shall not constitute an event of default under the issuance, nor shall it give rise to the acceleration of obligations, early redemption, operational restrictions, or any other contractual consequences for the Issuer. The foregoing is without prejudice to compliance with the applicable regulatory and prudential requirements established by the SSF, the BCR, the IGD, and other applicable regulations.

13. DISPUTE RESOLUTION

Arbitration, Governing Law, and Jurisdiction to Which the Parties Are Subject

A. General Provisions.

The Tokens are governed by and shall be interpreted in accordance with the laws of El Salvador, specifically the Digital Asset Issuance Law and the corresponding regulations.

All controversies, disputes, or claims arising out of or in connection with the issuance of the ATLÁNTIDA01 token, including those related to its interpretation, performance, validity, or termination, shall be resolved through arbitration in accordance with the rules and procedures established by the Mediation and Arbitration Center of the Chamber of Commerce and Industry of El Salvador.

The parties submit to the jurisdiction of the Republic of El Salvador.

The arbitral award shall be final and binding on the parties involved.

B. Features – Events of Default and Dispute Resolution

I. Events of Default

Events of Default shall be deemed to be those instances in which the Issuer commits a material breach of its obligations under this issuance, the Relevant Information Document, the applicable debt instrument, or applicable law.

Without prejudice to other circumstances that may be set forth in the contractual documentation, the following, among others, shall be considered Events of Default:

a. Failure to Pay

Failure to make timely payment of principal, returns, interest, or other financial obligations arising from the Digital Assets.

b. Material Misrepresentation

- The existence of false, inaccurate, or misleading statements of a material nature in the DIR,

the offering documents, or information provided to investors or authorities.

c. Misuse of funds

- The use of funds raised through the offering for purposes other than those established or authorized in this DIR.

d. Breach of the debt instrument

- A breach of obligations, covenants, conditions, or restrictions set forth in the debt instrument, related agreements, or this DIR.

e. Insolvency or financial deterioration

- The occurrence of events indicating the Issuer's insolvency, general inability to pay, suspension of payments, or equivalent conditions.

f. Intervention or measures by a regulatory authority

- Intervention, special supervision, takeover, resolution, or liquidation of the Issuer by a competent authority.

g. Material regulatory breach

- A serious or repeated failure to comply with legal or regulatory obligations applicable to the Issuer, PSAD, or the issuance, which may affect:
 - The validity of the issue;
 - Investors' rights;
 - The operability of the digital assets.

h. Significant technological or custody events

Serious failures in systems, cybersecurity, digital asset custody, or wallet management that materially affect the Issuer's ability to fulfill its obligations.

II. Effects of Events of Default

Upon the occurrence of a Default Event, the holders, the representative (if any), or any other authorized party may take action in accordance with the contract and the law.

The triggering of specific remedies may depend on the nature of the default, its materiality, and the provisions of the debt instrument.

III. Dispute Resolution

Any dispute, conflict, or claim arising from the issuance of the Digital Assets, their interpretation, execution, or performance, shall be resolved in accordance with the mechanisms set forth below:

a. Direct Resolution Mechanism

The parties shall endeavor to resolve the dispute through **direct negotiation** within a reasonable period of time.

b. Internal Escalation

- Disputes may be escalated to the appropriate departments of the Issuer (legal, compliance, customer service, or higher-level authorities), in accordance with its internal policies.

c. Alternative mechanisms

If a resolution cannot be reached, disputes may be submitted to:

- Mediation or conciliation, where applicable; or
- Arbitration, in accordance with the rules set forth in the contractual documentation.

d. Applicable Jurisdiction

Unless otherwise agreed, disputes may be submitted to the jurisdiction of the competent courts of the Republic of El Salvador, in accordance with applicable law.

IV. Disclosure to the Investor

The investor acknowledges and agrees that the occurrence of Events of Default may adversely affect:

- The value of the Digital Assets;
- The timing of payments;
- The liquidity of the investment;
- The exercise of their rights.

The investor also acknowledges that dispute resolution mechanisms may involve costs, delays, and uncertain outcomes.

C. Consequences of Events of Default

Upon the occurrence of one or more Events of Default, the Issuer will take the appropriate actions in accordance with applicable regulations, this Material Information Document, the bond indenture, and the Bank's internal policies, and may apply one or more of the following measures, depending on the nature, severity, and materiality of the default:

a. Notification to Regulatory Authorities

The Issuer will notify the **National Commission on Digital Assets (CNAD)** and, where applicable, other competent authorities, regarding the Event of Default, its nature, and the actions taken.

Furthermore, the Issuer will comply with any instructions, requirements, or measures issued by such authorities.

b. Communication to investors or tokenholders

The Issuer shall notify investors of the Event of Default using the communication channels established in this DIR.

The notice shall include, to the extent possible:

- A description of the event;
- Date of occurrence;
- Estimated impact;
- Measures taken or remediation plan.

Where applicable, the Issuer may convene investors or tokenholders to report on the situation, gather feedback, or reach agreements in accordance with the structure of the offering.

c. Exercise of Contractual Rights

- The Issuer and/or investors may exercise the contractual rights provided for in the applicable documentation, including:
- Enforcement of contractual remedies;
- Modification of terms in accordance with established mechanisms;
- Implementation of corrective or mitigating measures.

d. Legal Actions

Notwithstanding the foregoing, investors may take the appropriate legal actions to defend their rights, in accordance with applicable Salvadoran law.

Such actions may include judicial proceedings, arbitration, or alternative dispute resolution mechanisms as set forth in the contractual documentation.

e. Operational and Contingency Procedures

The Issuer may activate internal contingency protocols, including:

- Business continuity plans;
- Operational or technological corrective measures;
- Strengthening of controls;
- Replacement or adjustment of internal processes;
- Risk reviews and policy updates.

- In the event of technological or custody-related incidents, additional measures may be implemented to safeguard the integrity of the Digital Assets and the operational continuity of the issuance.

f. Operational Limitations

The Issuer may order the temporary suspension, limitation, or restriction of operations—including transfers or trading of Digital Assets—when necessary to:

- Manage the Default Event;
- Comply with regulatory provisions;
- Protect the integrity of the offering or the interests of investors.

I. General Procedure for Action

In the event of a Default, the Issuer will follow, to the extent applicable, the following procedure:

- Identification and validation of the event by the relevant departments (risk, compliance, legal, or others).
- Internal escalation in accordance with established mechanisms (committees or senior management).
- Assessment of the financial, operational, technological, and legal impact.
- Definition of corrective measures or actions to be implemented.
- Notification to regulatory authorities, when applicable.
- Communication to investors in accordance with established channels.
- Monitoring and documentation of the event and the actions taken.

II. Disclosure to the Investor

The investor acknowledges and agrees that the occurrence of Events of Default may result in the application of one or more of the measures described above, operational restrictions, legal actions, and regulatory proceedings, which could adversely affect:

- The value of the Digital Assets;
- The timeliness of payments;
- The liquidity of the investment;
- The effective exercise of the Investor's rights.

The investor also acknowledges that the mechanisms for enforcing rights and resolving defaults may involve costs, timeframes, and uncertain outcomes.

D. Jurisdiction, Governing Law, Investor Services, and Dispute Resolution

1. Governing Law

This issuance of Digital Assets, the Relevant Information Document, the debt instrument, and any legal relationship arising therefrom shall be governed by and interpreted in accordance with the laws of the Republic of El Salvador, including, without limitation:

- The Digital Asset Issuance Act;
- Its applicable regulations;
- The Banking Act;
- The prudential regulations issued by the Central Reserve Bank;
- The regulations on the prevention of money laundering (ML), terrorist financing (TF), and the financing of serious organized crime (FPADM); and
- Any other applicable legal or regulatory provision.

2. Jurisdiction and Competence

For all legal purposes arising from this offering, the Issuer and the investors submit to the jurisdiction of the Republic of El Salvador.

Without prejudice to alternative dispute resolution mechanisms, any dispute that cannot be resolved in accordance with the established procedures shall be subject to the jurisdiction of the courts of the Republic of El Salvador, in accordance with the applicable rules of jurisdiction.

3. Pre-Litigation Complaint Process and Investor Services

Prior to any judicial, arbitral, or administrative action, investors must exhaust the internal complaint and customer service mechanisms established by the Issuer, which are intended to provide a prompt, efficient, and documented resolution to any inquiry, complaint, or dispute.

a. Customer Service Channels

The Issuer will make the following channels available to investors:

- Bank Customer Service Center
- Email: infotoken@bancatlán.sv
- Designated digital platform or portal
- Bank Branches

b. Filing Complaints

Investors may file claims related to:

- the issuance of Digital Assets;
- payments or returns;
- access to information;
- operational restrictions (KYC/AML);
- custody or operation of wallets;

- any other aspect related to the investment.

c. Internal management and resolution

The Issuer will process claims in accordance with its internal policies, ensuring:

- recording and traceability of the complaint;
- review by the appropriate departments (legal, compliance, operations, or others);
- a response within a reasonable timeframe;
- clear communication regarding the resolution adopted;

4. Escalation of the Complaint

If the investor is not satisfied with the response provided, they may request a review of the case through an internal escalation process, in accordance with the Bank's procedures, which may involve higher-level authorities or internal committees.

5. Alternative Dispute Resolution Mechanisms

If a resolution cannot be reached through internal mechanisms, the parties may opt for alternative mechanisms, such as:

- Mediation or conciliation, in accordance with applicable law;
- Arbitration, provided that this has been agreed upon in the relevant contractual documentation.

6. Legal Actions

Notwithstanding the foregoing, investors may pursue any legal actions they deem appropriate to defend their rights, including judicial or arbitration proceedings, in accordance with the Salvadoran legal framework.

7. Intervention by Authorities

The investor may also turn to the competent authorities, including the National Commission on Digital Assets, if they believe there are regulatory violations or infringements of their rights as an investor.

8. Disclosure to the Investor

The investor acknowledges and agrees that:

- They must exhaust internal customer service and complaint mechanisms before initiating formal proceedings;
- Dispute resolution processes may involve costs, timeframes, and uncertain outcomes;
- Dispute resolution will be subject to Salvadoran law and the jurisdiction of its authorities and courts;
- The use of alternative dispute resolution mechanisms will depend on the terms agreed

upon in the contract.

14. PROCESSING OF PERSONAL DATA AND INSIDER INFORMATION

The Issuer hereby states that it will process investors' personal data with the utmost confidentiality in order to carry out its operational and commercial activities. These processes are conducted in accordance with the provisions of our Privacy Policy, which details the procedures and purposes of such data processing.

A. Processing of Personal Data, Investor Information, and Use of Information

1. Processing of Personal Data

The Issuer and the Digital Asset Service Provider (PSAD), in their capacity as data controllers, will process the personal data of investors, users, and participants in accordance with applicable Salvadoran law, financial and banking regulations, regulatory provisions issued by the competent authorities, and the Bank's internal policies.

The purposes of processing personal data include, among others:

- customer identification, verification, and due diligence (KYC);
- the prevention of money laundering, terrorist financing, and the proliferation of weapons of mass destruction (ML/TF/WMD);
- the management, administration, operation, and custody of Digital Assets;
- compliance with legal, regulatory, and contractual obligations;
- communication with investors; and
- risk management, auditing, oversight, and internal control.

2. Information Required for KYC/AML

Investors must provide personal, corporate, financial, and transactional information as required by the Issuer and/or the PSAD to comply with KYC obligations, due diligence, ongoing monitoring, and the prevention of ML/TF/PADM.

Failure to provide, update, or ensure the accuracy of such information may result in the limitation, suspension, rejection, or blocking of transactions, in accordance with the provisions of this Material Information Document and applicable regulations.

3. Use of Information Within the Platform

The information provided by investors may be used and processed within the Issuer's and/or the PSAD's technological platforms, systems, and operational tools, including systems for registration, custody, transaction monitoring, risk analytics, and user management.

The use of such information shall be limited to the purposes authorized and necessary for the operation of the offering, without prejudice to disclosure obligations to competent authorities.

4. Confidentiality and Inside Information

The Issuer will implement reasonable measures to protect the confidentiality of investors' information and any information that may qualify as sensitive or inside information, in accordance with applicable regulations.

Inside information or material information that may affect the value of the Digital Assets will be disclosed to investors in accordance with the principles of transparency and disclosure of material facts, without this implying the disclosure of protected personal data or unnecessary confidential information.

5. Transfer and Disclosure of Information to Third Parties

The Issuer and/or the PSAD may share or disclose investor information without the need for additional authorization when:

- it is required by a competent authority (CNAD, SSF, BCR, UIF, judicial or administrative authorities);
- it is necessary to comply with legal, regulatory, or contractual obligations;
- it is required for internal or external audits;
- it is necessary for the technological operation of the platform, with providers who are subject to confidentiality and information security obligations.

Under no circumstances will the information be used for purposes other than those permitted by applicable regulations.

6. Security and Control Measures

The Issuer and/or the PSAD will implement reasonable technical, organizational, and administrative measures to protect investor information from unauthorized access, loss, alteration, improper disclosure, or misuse, including access controls, audit trails, segregation of duties, and technological security protocols.

7. Investor Obligations

Investors must:

- provide accurate, complete, and up-to-date information;
- keep their information up to date for the duration of the investment;
- use the platform in accordance with the applicable terms and conditions.

- Failure to comply with these obligations may affect the operation of the Digital Assets or the exercise of certain rights.

8. Disclosure and Acceptance by the Investor

The investor acknowledges and agrees that the processing of their personal data and information will be carried out as described in this Relevant Information Document, and that such processing is necessary for participation in the offering and use of the platform.

Furthermore, the investor acknowledges that certain legal and regulatory obligations may require the collection, retention, and disclosure of information, without this giving rise to any liability on the part of the Issuer.

This policy is available for review on our marketing platform's website and mobile applications, as well as in **Annex VI. PSAD POLICIES**, ensuring transparency and compliance with current regulations regarding the protection of personal data.

In accordance with best security practices, investor information will be stored on encrypted technological infrastructure with restricted access. BANCO ATLÁNTIDA EL SALVADOR, S.A. will implement information segregation policies to prevent the exposure of sensitive data and proactively manage the risks associated with the handling of privileged information, ensuring the protection of each purchaser's privacy.

15. TAX SYSTEM

A. Tax Regime

The acquisition, ownership, transfer, trading, disposal, and receipt of returns, interest, profits, or any other economic benefit derived from Digital Assets may have tax implications for investors, both in the Republic of El Salvador and, in the case of foreign investors, in their jurisdiction of tax residence.

The applicable tax treatment will depend, among other factors, on:

- Whether the investor is a resident or nonresident;
- The investor's legal status (individual or legal entity);
- The tax laws in effect in El Salvador and/or in the relevant foreign jurisdiction;
- The existence of double taxation treaties, where applicable; and
- The manner and timing of transactions involving digital assets.

Digital Assets, their returns, or gains may be subject to taxes, withholdings, levies, or reporting obligations, including income taxes or capital gains taxes. The Issuer will only withhold taxes when there is an express legal obligation under applicable Salvadoran regulations, without assuming responsibility for the final tax treatment applicable to each investor.

The information contained in this Relevant Information Document does not constitute tax, fiscal, accounting, or legal advice, either in El Salvador or in any other jurisdiction. Any reference to the tax regime is of a general and informative nature.

Each investor, whether local or foreign, is solely responsible for assessing and complying with their tax obligations, as well as for seeking and obtaining their own independent tax advice, both in the Republic of El Salvador and in their jurisdiction of residence or in any other applicable jurisdiction.

Changes in tax legislation, international treaties, or the criteria of tax authorities could affect the net return on the investment, without this giving rise to any liability on the part of the Issuer.

Under no circumstances will the Issuer be liable for any taxes or tax obligations of investors. The issuance will be subject to the tax provisions set forth within the legal framework governing Digital Asset Service Providers, as well as Digital Asset Issuers and Issuances in force in the Republic of El Salvador.

In accordance with Article 36 of the Digital Asset Issuance Law, the issuance benefits from significant tax advantages that enhance the appeal of our digital asset offerings.

Tax Advice Disclaimer: While we describe the tax benefits associated with digital assets under Article 36 of the Digital Asset Issuance Law, it is important for participants to understand that the issuer does not provide tax advice. Participants are advised to consult their own tax professionals to fully understand the tax implications of purchasing, holding, or disposing of digital assets in accordance with their personal tax circumstances and the law applicable to them. The Bank assumes no liability for tax advice provided to participants by third parties or for participants' compliance with tax laws.

In the event of intervention, resolution, liquidation, revocation of authorization, suspension of operations, or any other administrative, regulatory, or judicial measure affecting the Issuer, the economic rights derived from the ATLÁNTIDA01 tokens shall be subject to the legal regime applicable to banking institutions, including the order of priority of claims, restrictions, procedures, and effects determined by the competent authority.

B. Disclaimer

This Key Information Document (KID), as published by the Issuer, is provided for informational purposes only and does not constitute an offer or a solicitation to buy or sell digital assets or related investment products ("Investment Products"). It should not be construed as investment, legal, accounting, or tax advice, nor as an indication that any Investment Product is suitable or

appropriate for your investment objectives, financial situation, or specific needs. Nor does it constitute personalized advice. This Document does not purport to identify or highlight all risks or important factors that may be associated with the Investment Products. If you have questions about any information related to an Investment Product, we recommend that you consult your own financial, legal, and/or tax advisors.

Any assumptions, data, projections, forecasts, or estimates presented herein are forward-looking statements based on information provided to the Issuer or publicly available. These reflect subjective estimates and assumptions regarding future events. Therefore, there is no guarantee that the projected or anticipated results will materialize. Actual results may differ from these projections, and such differences could be significant. Past performance is no guarantee of future results.

The information contained in this Relevant Information Document is believed to be reliable; however, it is provided “as is,” without any express or implied warranty.

This Relevant Information Document may only be distributed in countries where such distribution is legally permitted and is not intended for persons in jurisdictions where, due to their nationality, residence, or other reasons, such distribution is prohibited.

16. COMMUNICATION CHANNELS

Category	Description
Objective	To ensure that investors have access to accurate, sufficient, timely, and transparent information regarding the issuance of Digital Assets throughout its term.
Frequency	- Quarterly: Regular periodic reports - Annual: Corporate Governance Report or Annual Report - As needed: Immediate disclosure of material events - Special: When required by authorities or the Issuer
Financial Information	- Financial statements (condensed or complete) - Relevant financial indicators - Information on the issuer's liquidity and ability to pay
Status of the Offering	- Authorized amount and amount placed - Breakdown of placed tranches - Outstanding tranches (if applicable) - Current balance of the issue
Payment Status	- Payments made (principal, interest, or other) - Schedule of future payments - Defaults, delays, or modifications (if any)
Operational Information	- General status of the issue - Performance of the structure - Relevant information regarding administration
Custody and Digital Operations	- Custody status of digital assets - Changes to wallets or infrastructure - Relevant security or continuity incidents

Risks and Compliance	- Changes in the risk profile - Significant regulatory events - Material information regarding KYC/AML
Material Events	Events that significantly affect the following will be disclosed: - the value of the digital asset - the issuer's ability to pay - investors' rights - the operation of the issuance
Examples of Material Events	- Changes to the terms of the issuance - Changes in participants or roles - Breaches - Technical or cybersecurity incidents - Regulatory or judicial decisions
Publication Channels	- Official website of Banco Atlántida El Salvador, S.A. - Digital platforms or investor portals - Publications in accordance with SSF guidelines - Electronic notifications - Systems authorized by CNAD
Institutional Transparency	The Bank ensures transparency through: - Publication of financial and institutional information - Disclosure of indicators in accordance with the SSF - Access to information relevant to investors
Annual Report	Annual publication of: - Corporate Governance Report or - Annual Report, including structure, risks, internal controls, and institutional performance
Access to Information	Available information: - In accessible and understandable formats - For a reasonable period of time - Aligned with regulatory information
Policy Update	The Issuer may modify the frequency, content, or means of disclosure when: - there is a regulatory change - a competent authority requires it - it is necessary to improve transparency
Notification of Changes	Changes will be communicated in a timely manner to investors and the CNAD through the designated channels

For any questions, inquiries, additional information, or notifications regarding this Material Information Document, please use the following contact information: the email address infotoken@bancatlan.sv and the phone number 2223-7676, and the following address: 1 Calle Poniente, Blvd. Constitución, Colonia Escalón, #3510, District of San Salvador, Municipality of San Salvador, Department of San Salvador. Furthermore, I authorize Ingrid Segovia to receive notifications or any documents that must be delivered to us at the previously established address.

A. Other Declarations:

In accordance with the provisions of the Regulations on the Registration of Issuers and Public and Private Offerings, BANCO ATLÁNTIDA EL SALVADOR, S.A. declares:

- “The issuer of the digital assets is solely responsible for the content of this Material Information Document”;
- The digital assets that are the subject of this offering are registered in the CNAD’s Public Registry. Their registration does not imply any certification regarding the quality of the security or the issuer’s solvency”;
- It is the investor’s responsibility to read all the information contained in this Material Information Document”;
- Digital assets may lose all or part of their value;
- Digital assets may not always be tradable;
- Digital assets may not be liquid;
- The offering focuses solely on certain specific digital assets and does not constitute an invitation to sell financial instruments; and
- This offering is subject to applicable regulations and does not constitute an offer in jurisdictions where its marketing is illegal.

B. Investor Protection

This issuance of Digital Assets has been structured by Banco Atlántida El Salvador, S.A., which participates in it in the capacities of Issuer, Digital Asset Service Provider (PSAD), structurer, administrator, custodian, and legal advisor, in accordance with the provisions of the Digital Asset Issuance Law, its regulations, and other applicable rules.

In light of the Bank’s multiple roles, the Key Information Document (KID) incorporates specific measures aimed at ensuring functional segregation, the management and mitigation of conflicts of interest, the traceability of decisions, and the sufficient and transparent disclosure of information to investors, in accordance with the principles established in the Digital Asset Issuance Law and its implementing regulations.

In order to uphold the principles of investor protection, transparency, and adequate disclosure, the RID includes, among others, the following elements:

- Express warnings to investors, stating that the registration or authorization of the issuance with the National Commission on Digital Assets (CNAD) does not constitute certification of the quality of the Digital Asset, nor a guarantee of the Issuer’s solvency, nor an investment recommendation, and that Digital Assets may lose value, lack liquidity, may not be tradable, and do not guarantee future returns, in accordance with the requirements of the Digital Asset Issuance Act and its regulations.
- Registration, traceability, and control mechanisms that enable the tracking of ownership, transfer, and relevant events pertaining to Digital Assets, in accordance with the obligations of

issuers and PSADs set forth in the Digital Asset Issuance Act and the regulations issued by the CNAD.

- Operational safeguarding of funds prior to meeting the minimum placement amounts, where applicable, in accordance with the conditions set forth in the DIR and in the corresponding bond offering document.
- A system of continuous disclosure and periodic reporting, which includes the issuer's financial information, payment status, placed tranches, current balance of the issuance, and timely disclosure of material events, in accordance with the principles of public disclosure and transparency established in applicable regulations and the obligations of continuous reporting to investors and authorities.
- Express identification of events of default, their consequences, procedures for notifying the CNAD and investors, possible remedial measures, and available legal actions, in accordance with the provisions of the DIR, the bond offering document, and applicable legislation.
- Formal investor service and complaint channels, with procedures for handling, responding to, and internally escalating issues, as a mechanism prior to the initiation of judicial or arbitration proceedings, in line with best practices for the protection of financial consumers and applicable banking regulations.
- Specific controls for conflicts of interest, including functional segregation between departments, internal committees, information barriers, operational controls, and document traceability, in compliance with the corporate governance, risk management, and internal control obligations set forth in the Banking Act and applicable prudential regulations.
- Rules applicable to refunds, returns, or settlements, where applicable, expressly stating that such provisions do not constitute a buyback guarantee, liquidity guarantee, or guarantee of full recovery of the investment.
- Processing of personal data, confidentiality, and KYC/AML obligations, through a Privacy Notice that governs the collection, use, retention, and disclosure of investor information, in accordance with the Digital Asset Issuance Act, the regulations applicable to PSADs, the Banking Act, and anti-money laundering and counter-terrorism financing regulations.
- Tax Disclosures for Domestic and Foreign Investors, stating that the DIR does not constitute tax advice and that each investor is responsible for obtaining independent tax advice in accordance with applicable tax laws.

Overall, the Relevant Information Document has been prepared in accordance with the principles of transparency, informational sufficiency, traceability, risk management, and investor protection, consistent with the regulatory framework applicable to Digital Asset issuances in the Republic of El Salvador, without attributing to the CNAD any validations, guarantees, or certifications other than those expressly provided for in the Law.

17. APPENDICES

Appendix I - Affidavit.

Appendix II – Certifier’s Report.

Appendix III – Issuer’s Financial Statements.

Appendix IV – Financial Projections for the Offering.

Appendix V – Relevant Statements

Appendix VI – PSAD and Issuer Policies

Appendix VII—Digital Identity of the Tokens.