

LEGAL OPINION

Subject: Portuguese Golden Visa with a 280.000,00 Euros investment in the development designated “Vouga Living”, located in São Pedro do Sul, Portugal

Date: February 1st, 2021

I. INTRODUCTION

PINTO RIBEIRO ADVOGADOS is a Portuguese law firm duly registered before the Portuguese Bar Association which offers a full package of legal services covering from property purchase to the Golden Visa initial and renewal applications.

PINTO RIBEIRO ADVOGADOS has been instructed to conduct a legal examination and analysis regarding the envisaged purchase of independent units for residential purposes, in the urban building named Vessada Grande dos Vales, registered under the horizontal property regime, located at Rua do Gerós, nos. 119, 141, 165, 187, 207, 223 and 241, in Termas de São Pedro do Sul, in the parish of União de Freguesias de São Pedro do Sul, Várzea e Baiões, municipality of São Pedro do Sul, registered at the Land Registry Office of São Pedro under number 1119 of the extinguished parish of São Pedro do Sul and inscribed at the Tax Office under article 2273 of the parish of de União de Freguesias de São Pedro do Sul, Várzea e Baiões (the "**Property**").

The envisaged purchase, combined with the renovation of the Property, shall be able to qualify the potential clients for the concession of a residency permit for investment under the Portuguese Golden Visa Programme (the "**Transaction**").

This report is solely for the use and exclusive benefit of the potential clients in connection with the Transaction described in the preceding paragraph and may not be disclosed to or relied upon by anyone other than you or used for any other purpose.

II. SCOPE

Our law firm was also asked to issue a legal opinion on the feasibility of obtaining an investment residency permit (“Golden Visa”) by completing a minimum 280.000,00 Euros property investment in the Property.

Our opinion shall be expressed only regarding the Portuguese legal framework and we express no opinion to any other law but the Portuguese one.

III. DOCUMENTATION EXAMINATION AND ANALYSIS

With respect to the Portuguese law, property purchase combined with renovation works in a low-density territory can be reduced to a minimum 280.000,00 Euros threshold.

For this purpose, low density territory is a municipality with either a GDP below 75% of the Portuguese country GDP or less than 100 inhabitants per square meter. Any investment made in these territories shall be granted a 20% reduction over the minimum investment threshold.

In respect to the renovation works, the immigration regulations in force also provide that only renovation of properties with either more than 30 years of construction or located in an Urban Renovation Area can be eligible for this type of investment.

Based and relying upon, and subject to the foregoing, we are of the opinion that this investment possibility is valid because:

- The development is located within the limits of the Urban Renovation Area of São Pedro do Sul, as delimited by *Aviso* No. 7492-A/2018 available in http://www.cm-spsul.pt/images/files/consultapublica/aru/planta_aru.pdf ;
- The Municipality of São Pedro do Sul is a low-density territory as it has only 79,40 inhabitants per square kilometer in accordance with the latest statistical data provided by *Instituto Nacional de Estatística* – the Portuguese Statistical Authority.

IV. TRANSACTION

The Client pretends to apply for the concession of a residency permit for investment under the Portuguese Golden Visa Program, in the 280.000,00 Euros policy investment, which shall combine purchase and property renovation in a low-density area.

The Property fulfills the requirements set forth in Article 90-A of Law No. 23/2007 of July 4, as amended more recently by Law No. 102/2017 of August 28, and Articles 65-A to 65-K of Regulatory Decree no. 84/2007 of November 5, as amended more recently by Law no. 71/2018 of December 31, notably:

- a) The property is within the limits of the Urban Renovation Area of the city of São Pedro do Sul;
- b) The Municipality of São Pedro do Sul is considered as a low-density territory.

In respect to the property renovation, the Client must present a renovation contract signed with a duly registered construction company, together with the invoice issued by the construction company. Both documents will be submitted to the Portuguese Immigration Authorities when applying for the Golden Visa.

In order for the investment to eligible under the 280.000,00 Euros policy investment, the sum of these operations would need to make up for a total investment of € 280.000,00 (two-hundred and eighty thousand euros), thus fulfilling the requirements set forth in Article 3rd, Paragraph 1, Heading d), Sub-Heading iv), and Article 3rd, Paragraph 2 of Law No. 23/2007 of July 4, as amended more recently by Law No. 102/2017 of August 28.

In respect to the Golden Visa application, it will be possible to initiate the application by delivering the following documents:

- Final deed or promissory agreement regarding the unit to be bought;
- Works contract and invoice issued by the contractor (contractor must be a duly registered company before *Instituto dos Mercados Públicos, do Imobiliário e da Construção, I.P.* (IMPIC);
- Bank declaration making evidence of the bank cheque payments made to the developer and to the contractor;
- Statement issued by the Municipality of São Pedro do Sul confirming that the development is located in an Urban Area of Renovation.

V. CONCLUSIONS

Based and relying upon all the documentation and information examined, we are of the opinion that the Property would be legally eligible for the purpose of the investment to be conducted by the final client (Golden Visa application) and there would be no outstanding or material issues related to the Property and the envisaged Transaction which could prevent the purchase from proceeding.

Lisbon, February 1st, 2021.

The Lawyer,

DIOGO OLIVEIRA SANTOS