

CAIXA – BANCO DE INVESTIMENTO, SA

Anti-Money Laundering and Counter-Terrorism Financing Disclosure Statement

1. Administrative Information

- **Legal name:** Caixa – Banco de Investimento, SA (CaixaBI)

- **Principal place of business / legal address:**
Av. João XXI, nº 63
1000-300 Lisboa, Portugal

- **Place of incorporation:** Lisboa, Portugal

- **SWIFT BIC CODE:** CXBI PT PL

- **Legal status:** 99.72% State owned company, plc

- **Shareholder:** 94.02% Caixa Geral de Depósitos and 5.70% Caixa Participações, SGPS, SA

- **Regulators:** Banco de Portugal, www.bportugal.pt, Comissão do Mercado de Valores Mobiliários www.cmvm.pt

- **Financial Institution Register:** 025

- **External Auditors:** Deloitte & Associados, SROC SA

- **AML contact:** Compliance Officer
Address: Av. João XXI, nº 63
1000-300 Lisboa, Portugal
Phone number: + 351 21 313 73 00
Fax number: + 351 21 352 63 27
Email address: gabinete.compliance@caixabi.pt

2. Relevant International and National Framework

International Framework:

- 40 Recommendations of FAFT/GAFI (developed in 1990, revised in 1996, 2003, 2004 and 2012) that provide a complete set of counter-measures against money laundering covering the criminal justice system and law enforcement, the financial system and its regulation, and international co-operation;
- 4rd AML European Directive where the main principles and provisions, about prevention of the use of the financial system for the purpose of money laundering and terrorist financing, enforced upon all EU Member States, are defined;
- European Directive 2258/ 2016 of the Council, of 6 December 2016;
- EC Regulation 847/2015 of the European Parliament and of the Council of 20 May 2015;
- Council of Europe convention on laundering, search, seizure and confiscation of the proceeds from crime and on the financing of terrorism (Warsaw, 16.V.2005).

National Framework:

- Law 83/2017 (issued in august, 18) portuguese law that transposes the 4rd AML Directive;
- Official Notice 05/ 2013, by portuguese banking supervisor, Bank of Portugal where the procedures to be put in place by banks are defined, regarding customer identification, record keeping and the reporting of suspicious transaction;
- Criminal Code Article 11 (as approved by law 59/2007 of 4th September);
- Law 52/ 2003 of 22nd August (as amended by law 59/ 2007 of 4th September);
- Decree-law 61/2007 of 14th March;
- Securities Code - Articles 304 t o 305- E (as amended by Decree-law 357-A/2007 of 31st October);
- Decree-law 144/2006, of 31st July Articles 13 and 29;
- CMVM Regulation N. 2/2007;

3. AML / CTF Measures in International Operations of CaixaBI

In the International operations that CaixaBI has a controlling interest in, policies and procedures are in place, which assist the operations to comply with their respective domestic AML/CTF laws.

4. Anti-Money Laundering and Counter -Terrorism Financing (AML/ CTF) Measures in CaixaBI

CaixaBI has adopted internal policies, procedures and controls to ensure that it complies with AML/CTF obligations in existing legislation and regulations.

CaixaBI has adopted an AML/CFT program that reasonably identifies, mitigates and manages the risk of money laundering and terrorism financing according to the legislation. This program has been approved by CaixaBI's Board of Directors and is implemented in the bank and its branches.

Being Portugal a member country of the EU and of the Financial Action Task Force on Money Laundering (FAFT/GAFI), CaixaBI and all its domestic and international branches, adhere to and apply the following policies and procedures:

Customer Due Diligence/ Know Your Customer: CaixaBI has policies and procedures in place to comply with the obligation to identify and perform due diligence on customers.

Politically Exposed Persons (PEPs): CaixaBI has enhanced due diligence and transaction screen towards customers or beneficial owners who are PEPs.

Anonymous and numbered accounts: CaixaBI does not provide customers with anonymous or numbered accounts.

Record Keeping: Records relating to customer identification and original documents, copies, references or any other durable support systems, equally admissible in court proceedings as evidence, of the demonstrative documents and of the records of the transactions, are kept to enable the reconstruction of the transaction, for a period of seven (7) years after its execution, even if the transaction is part of a business relationship that has already ended.

Monitoring of Suspicious Activities: Screening of customers transactions is carried out by an I T solution through a risk-based approach and also by the CaixaBI's workers.

Reports of Suspicious Transactions: CaixaBI is required to report any suspicious customer activities or transactions to PGR - Procurador Geral da República (Republics General Attorney) and to UI F- Unidade de Informação Financeira (Financial Intelligence Unit). Internal policies and procedures are in place to ensure compliance with the applicable legislation and regulatory requirements.

Reports of significant account and non- account based cash transactions and all IMTs: CaixaBI is an Investment Bank and cash deposits are not authorized.

Employee Training Program: AML/CFT training is provided to all units. Staff involved in customer facing areas, receive special training and reminders on the detection and reporting process for suspicious activities.

Employee due diligence: CaixaBI has processes that provide reasonable assurance of the identity, honesty and integrity of prospective and existing employees.

Independent audit and compliance review function: Our internal auditors and the compliance department conduct programs of audit and compliance tests of all CaixaBI's policies and operational procedures including those applicable to AML. The audit and compliance programs are approved by senior management.

Correspondent Banks: CaixaBI has implemented risk based due diligence procedures that include the following understanding the nature of the correspondents business, its license to operate, the quality of its management, ownership and effective control, its AML policies, external oversight and prudential supervision including its AML/CFT regime. Additionally, ongoing due diligence of correspondent accounts is performed on a regular basis or when circumstances change. All correspondent banking relationships are approved by senior management.

Shell Banks: CaixaBI does not conduct business with shell banks, as defined in the AML/CFT law.

Payable- through accounts: CaixaBI doesn't provide payable through accounts because our policies and procedures prohibit offering this kind of services as defined in the AML/CFT regime.

Please find CaixaBI Wolfsberg AML Questionnaire in the website (www.caixabi.pt).

5. USA Patriot Act Certificate

Under the Uniting and Strengthening America by Providing Appropriate Tools Required to Intercept and Obstruct Terrorism (USA Patriot Act) Act 2001, CaixaBI may be required from time to time to provide Certification Regarding Accounts for Foreign banks.

Please find USA Patriot Act Certificate in the website (www.caixabi.pt).