

SWIFT/BIC Code

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Banco Bradesco Europa S.A. AML/CTF Questionnaire

1. Financial Institution Details

Financial Institution's (FI) full name (in English if available)
Banco Bradesco Europa S.A.
Other Trading Names (local names)
BBE
Head Office address
25, rue Edward Steichen, L-2540 Luxembourg
Website Address
www.bradescoeuropa.eu

Registration Details	
Registering Authority	Country of Registration
Registre de Commerce et des Sociétés	Luxembourg
Corporate registration or identification number (Head Office)	Date of Registration
B18996	15/01/1982
Registered Business Address	
25, rue Edward Steichen, L-2540 Luxembourg	
Name of external auditors	
KPMG Luxembourg	

Banking/professional Licences	Yes	No	Licence No
Is your FI licensed in your country of domicile?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Who is your main Regulator?	Country where regulated		
CSSF - Commission de Surveillance du Secteur Financier	Luxembourg		

Branches and subsidiaries	Yes	No
Do you have foreign branches and/or subsidiaries?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
If yes, are these branches and/or subsidiaries subject to the anti money laundering laws applicable to your head office?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
If no, Please fill in Attachment A and provide regulatory authorities and relevant regulations for each foreign branch/subsidiary.	A. Excluded branches & subsidiaries.	

Shell Bank ¹	Yes	No
Is your FI or any of your branches or subsidiaries a shell bank?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Does your FI or any of your branches or subsidiaries have a correspondent banking relationship with a shell bank?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

¹ "shell bank" means a credit institution, or an institution engaged in equivalent activities, incorporated in a jurisdiction in which it has no physical presence, involving meaningful mind and management, and which is unaffiliated with a regulated financial group.

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Does your FI or any of your branches or subsidiaries have a correspondent banking relationship with another financial institution that has a correspondent banking relationship with a shell bank?

Regulatory Action

	Yes	No	Comments/Mitigation Strategies
Has any regulatory action which has been publicly disclosed been taken against your FI or its ultimate Parent within the last 3 years, including action taken by your AML/CTF regulator, banking regulator or corporate regulator? If so, please provide further information describing the nature of the regulatory action and any remedial action taken by your FI.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	

2. Parent Details

Parent's full name	
Banco Bradesco S.A.	
Head Office address	
Cidade de Deus, Vila Yara Osasco, SP 06029-900 Brazil	
Website Address	
www.bradesco.com	
Who is the Parent's registering authority?	Country of Registration
Banco Central do Brasil	Brazil
Registration Number	Date of Registration
17.913	02 March 1943
Registered Business Address	
Cidade de Deus, Vila Yara Osasco, SP 06029-900 Brazil	
Who is the Parent's main Banking Regulator (if any)?	Country where regulated
Banco Central do Brasil	Brazil

3. Ownership Details

Please note that Attachment B provides space to qualify any 'Yes' answer or to explain any 'No' answer.		
Stock Exchange Listings	Yes	No
Is your FI publicly owned?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Is your FI listed on any stock exchange? If so, please name the stock exchange.	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	Name of the Stock Exchange	
Beneficial Ownership	Yes	No
If your FI is not listed on any stock exchange, does your FI have parties holding greater than 25% of the paid-up share capital?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Please list all parties holding greater than 25% of the paid-up share capital in Attachment B.	B. Parties holding >25% of the paid-up share capital.	

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4. Financial Institution's Business and Customer Base

Payable Through Accounts	Yes	No
Does your FI allow third parties to have direct access to your correspondent banking account?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Has your FI verified the identity of any third party having direct access to your correspondent banking account <i>(including all signatories)</i> ?	n/a	n/a
Does your FI perform ongoing due diligence on any third party having direct access to your correspondent banking account <i>(including all signatories)</i> ?	n/a	n/a
Is your FI willing and able to provide customer identification information on the third party <i>(and all signatories)</i> to Banco Bradesco Europa upon request?	n/a	n/a

Business Nature	
What is your business line	Private Banking and Corporate Lending

Customer Base			
Banco Bradesco Europa considers the following types of customer to have a higher AML/CTF risk profile. Do you deal with any of these customer types? If so, please provide us with details of your risk mitigation strategies.	Yes	No	Comments /Mitigation strategies
Companies with nominee share holders or bearer shares	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Money Service Bureaus/Alternative Remitters	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Electronic goods	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Cash intensive business	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Dealers in high-value goods	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Jewellers	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Real estate agents	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Politically Exposed Persons (PEPs)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Enhanced Due Diligence
High net worth individuals	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Enhanced Due Diligence
Unregulated charities	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Trusts	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Entities on sanctions lists:			
UN,	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
UK,	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
EU,	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
US,	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
other	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Casinos	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Arms dealers	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Other <i>(please specify)</i>	n/a	n/a	

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5. Wolfsberg AML/CTF Questions

Please answer 'Yes' or 'No'. If 'No' please provide additional information describing your mitigation strategies.

General AML/CTF Policies, Practices and Procedures			
	Yes	No	Comments/Mitigation Strategies
1. Is the AML compliance program approved by the FI's board or a senior committee?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
2. Does the FI have a legal and regulatory compliance program that includes a designated officer that is responsible for coordinating and overseeing the AML framework?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
3. Has the FI developed written policies documenting the processes that they have in place to prevent, detect and report suspicious transactions?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
4. In addition to the inspections by the government supervisors / regulators, does the FI client have an internal audit function or other independent arty that assesses AML policies and practices on a regular basis?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
5. Does the FI have a policy prohibiting accounts / relationships with shell banks (A shell bank is defined as a bank incorporated in a jurisdiction in which it has no physical presence and which is unaffiliated with a regulated financial group.)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
6. Does the FI have policies to reasonably ensure that they will not conduct transactions with or on behalf of shell banks through any of its accounts or products?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
7. Does the FI have policies covering relationships with Politically Exposed Persons (PEP's), their family and close associates?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
8. Does the FI have record retention procedures that comply with applicable law?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
9. Are the FI's AML policies and practices being applied to all branches and subsidiaries of the FI both in the home country and in locations outside of that jurisdiction?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	

Risk Assessment			
	Yes	No	Comments/Mitigation Strategies
10. Does the FI have a risk-based assessment of its customer base and their transactions?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
11. Does the FI determine the appropriate level of enhanced due diligence necessary for those categories of customers and transactions that the FI has reason to believe pose a heightened risk of illicit activities at or through the FI?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	

Know Your Customer, Due Diligence and Enhanced Due Diligence			
	Yes	No	Comments/Mitigation Strategies
12. Has the FI implemented processes for the identification of those customers on whose behalf it maintains or operates accounts or conducts transactions?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
13. Does the FI have a requirement to collect information regarding its customers' business activities?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	

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14. Does the FI collect information and assess its FI customer's AML policies and practices?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
15. Does the FI have a process to review and, where appropriate, update customer information relating to high risk client information?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
16. Does the FI have procedures to establish a record for each new customer noting their respective identification documents and Know Your Customer information?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
17. Does the FI complete a risk-based assessment to understand the normal and expected transactions of its customers?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	

Reportable Transactions and Prevention & Detection of Transactions with Illegally Obtained Funds

	Yes	No	Comments/Mitigation Strategies
18. Does the FI have policies or practices for the identification and reporting of transactions that are required to be reported to the authorities?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
19. Where cash transaction reporting is mandatory, does the FI have procedures to identify transactions structured to avoid such obligations?	n/a	n/a	
20. Does the FI screen customers and transactions against lists of persons, entities or countries issued by government/competent authorities?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
21. Does the FI have policies to reasonably ensure that it only operates with correspondent banks that possess licenses to operate in their countries of origin?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
22. Does the FI adhere to the Wolfsberg Transparency Principles and the appropriate usage of the SWIFT MT 202/202COV and MT 205/205COV message formats?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	

Transaction Monitoring

	Yes	No	Comments/Mitigation Strategies
23. Does the FI have a monitoring program for unusual and potentially suspicious activity that covers funds transfers and monetary instruments such as travelers checks, money orders, etc?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	

AML Training

	Yes	No	Comments/Mitigation Strategies
24. Does the FI provide AML training to relevant employees that includes: - Identification and reporting of transactions that must be reported to government authorities. - Examples of different forms of money laundering involving the FI's products and services. - Internal policies to prevent money laundering?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
25. Does the FI retain records of its training sessions including attendance records and relevant training	<input checked="" type="checkbox"/>	<input type="checkbox"/>	

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materials used?			
26. Does the FI communicate new AML related laws or changes to existing AML related policies or practices to relevant employees?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
27. Does the FI employ third parties to carry out some of the, functions of the FI?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
28. If the answer to question 27 is yes, does the FI provide AML training to relevant third parties that includes: - Identification and reporting of transactions that must be reported to government authorities. - Examples of different forms of money laundering involving the FI's products and services. - Internal policies to prevent money laundering.	n/a	n/a	

6. AML/CTF Certification

I, Gavan Guilfoyle, certify that I have read and understood this Questionnaire, that the statements made herein are complete and correct, and that I am authorised to execute this Questionnaire on behalf of Banco Bradesco Europa S.A..

Executed on 14/07/2020.

[Signature]

Gavan Guilfoyle, Chef Compliance Officer

