

CAIXA GERAL DE DEPÓSITOS, SA

Anti-Money Laundering and Counter-Terrorism Financing Disclosure Statement

1. Administrative Information

- **Legal name:** Caixa Geral de Depósitos, SA (CGD)
- **Principal place of business / legal address:**
 - Av. João XXI, nº 63
 - 1000-300 Lisboa, Portugal
- **Place of incorporation:** Lisboa, Portugal
- **SWIFT 7 BIC Code:** CGDI PT PL
- **Legal status:** 100% State owned company, plc
- **Shareholder:** State of the Portuguese Republic
- **Regulators:** Banco de Portugal www.bportugal.pt Comissão do Mercado de Valores Mobiliários www.cmvm.pt
- **Financial Institution Register:** 35
- **External Auditors:** Deloitte & Associados, SROC SA
- **AML contact:** Head of Compliance – Office
 - Address: Av. João XXI, nº 63
 - 1000-300 Lisboa, Portugal
 - Phone number: 351 21 8456077
 - Fax number: 351 21 7905471
 - Email address: gfc.branqueamentocapitais@cgd.pt

2. Relevant International and National Framework

International Framework:

- 40 Recommendations of FAFT/GAFI (developed in 1990, revised in 1996, 2003 e 2004) – 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;
- 9 Special Recommendations of FAFT/GAFI (issued in 2001, updated in 2004) – that set out principles for action to detect, prevent and suppress the financing of terrorism;
- 3rd 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;
- EC Regulation 1889/2005 of the European Parliament and the Council, of 26 October 2005;
- EC Regulation 1781/2006 of the European Parliament and of the Council of 15 November 2006;
- 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 25/2008 (issued in June, 5) – portuguese law that transposes the 3rd AML Directive;
- Official Notice 11/2005, updated by Official Notice 2/2007, and Instruction 26/2005 (issued 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;
- Decree-law 125/2008 of 21st June;
- Securities Code – Articles 304 to 305-E (as amended by Decree-law 357-A/2007 of 31st October);
- Decree-law 144/2006, of 31st July – Articles 13 and 29.

3. AML / CTF Measures in International Operations of CGD

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

Under CGD Internal Policy (based on article 29 of law 25/2008) its branches and majority-owned subsidiaries in third countries apply measures equivalent to those laid down by portuguese law, regarding identification, due diligence, correspondent banking, record keeping and training.

We also implemented the policies and internal procedures defined in compliance, namely internal control, evaluation and risk assessment and management and internal audit, in order to effectively prevent money laundering and terrorism financing.

Where the legislation of the third country does not allow the whole application of the measures in the financial institutions, CGD had informed its competent supervisory authority (Bank of Portugal) of that fact and took additional measures to prevent the risk of money laundering and terrorism financing.

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

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

CGD 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 CGD's Board of Directors and is implemented in its branches and majority-owned subsidiaries in third countries.

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

Customer Due Diligence/ Know Your Customer: CGD has policies and procedures in place to comply with the obligation to identify and perform due diligence on customers which includes a filtering IT solution (to check and watch proscribed lists) and is implementing an IT solution to score customer's profile based on ML/TF risk.

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

Anonymous and numbered accounts: CGD 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 customer's transactions is carried out by an IT solution through a risk-based approach and also by the CGD's workers.

Reports of Suspicious Transactions: CGD is required to report any suspicious customer activities or transactions to PGR – Procurador Geral da República (Republic's General Attorney) and to UIF – 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: CGD is required to report significant account cash transactions over €15.000 (or less, if suspicious) to those entities and to the regulatory authority IMT to offshore jurisdictions. Details of all IMTs (wire transfers) such as sender and beneficiary names and address are checked against watch lists. Internal policies and procedures are in place to ensure compliance with the applicable legislation and regulatory requirements.

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: CGD 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 CGD's policies and operational procedures including those applicable to AML. The audit and compliance programs are approved by senior management.

Correspondent Banks: CGD has implemented risk based due diligence procedures that include the following – understanding the nature of the correspondent's 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: CGD does not conduct business with shell banks, as defined in the AML/CFT law.

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

Assessment of payments against watch lists and proscribed lists (TF and sanctions): CGD has an IT solution to filter all inward and outward payments against UN, EU and OFAC proscribed lists.

Please find 'CGD Wolfsberg AML Questionnaire' in the website (www.cgd.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, CGD 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.cgd.pt).