

Anti-Money Laundering and Counter-Terrorism Financing Disclosure Statement

1. Institutional 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 BIC Code:** CGDI PT PL
- **Legal status:** 100% State owned company, plc
- **Shareholder:** State of the Portuguese Republic
- **Regulators:** European Central Bank (www.ecb.europa.eu), Banco de Portugal (www.bportugal.pt), Comissão do Mercado de Valores Mobiliários (www.cmvm.pt)
- **Financial Institution Register:** 35
- **External Auditors:** Ernst & Young Audit & Associados - SROC, S.A
- **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, 2004 and 2012) – that provide a complete set of counter-measures against money laundering and terrorist financing covering the criminal justice system and law enforcement, the financial system and its regulation, and international co-operation;
- Directive (EU) 2015/849 - 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;
- Directive (EU) 2016/2258 of the European Parliament and of the Council of 06 December 2016 regarding access to anti-money-laundering information by tax authorities.
- EC Regulation 1889/2005 of the European Parliament and the Council, of 26 October 2005, on controls of cash entering or leaving the Community;
- EC Regulation 2015/847 of the European Parliament and of the Council of 20 May 2015, on information accompanying transfers of funds.

National Framework:

- Law 4/83 of 2nd April;
- Law 5/2002 of 11th January;
- Law 11/2002 of 16th February;
- Law 52/2003 of 22nd August (as amended by law 59/2007 of 4th September);
- Law 88/2009 of 31st August;
- Law No 83/2017 of 18 August 2017 - Establishes measures to combat money laundering and terrorism financing, partially transposing the Directives 2015/849/EU of the European Parliament and of the Council of May 20, 2015, and 2016/2258/EU of the Council of 6 December 2016, amends the Criminal Code and the Industrial Property Code and repeals Law no. 25/2008, of June 5;
- Law No 89/2017 of 21 August 2017 - Approves the Legal Regime of the Central Register of Beneficial Ownership, provided for in article 34 of Law no. 83/2017, of August 18;
- Law No 92/2017 of 22 August 2017 - Requires the use of a specific means of payment in transactions involving amounts equal to or greater than EUR 3000;
- Law No 97/2017 of 23 August 2017 - Regulates the implementation and enforcement of restrictive measures adopted by the United Nations or the

European Union and establishes the penalties applicable to infringements of these measures;

- Decree-law 61/2007 of 14th March, Approves the legal system governing the control of cash carried by natural persons entering or leaving the EU through the Portuguese territory, and the control of cash movements with other EU Member States;
- Executive Order 150/2004 of 13 February 2004, updated by Executive Order 292/2011 of 8 November 2011 – Establishes the list of countries, territories and regions with privileged taxation systems;
- Executive Order 233/2018 of 21 August 2018 - Regulates the Legal Regime of the Central Register of Beneficial Ownership;
- Notice of Banco de Portugal No 7/2009 of 16 September 2009 – Prohibits credit granting to entities having their head office in an offshore jurisdiction considered as non-cooperative or whose ultimate beneficiary is unknown;
- Official Notice 5/2013, updated by Official Notice 1/2014 (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);
- Criminal Code – Article 368-A;
- Securities Code – Articles 304 to 305-E (as amended by Decree-law 357-A/2007 of 31st October).

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 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.

Holders of other political or public positions: CGD has enhanced due diligence and transaction screen towards customers or beneficial owners who are holders of other political or public positions as defined in Official Notice 5/2013 (Bank of Portugal).

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 the Board of Directors.

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 the Board of Directors.

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.

Sanctions Policy: CGD has implemented a set of policies and procedures to ensure that the institution does not establish or maintain a business relationship, or process operations to / for the benefit of persons, entities or sanctioned countries.

Please find 'Sanctions Policy' in the website (www.cgd.pt).

5. Wolfsberg AML Questionnaire

CGD follows the principles contained in Wolfsberg AML Questionnaire concerning AML/CTF.

The Wolfsberg AML Questionnaire CGD is available in the website (www.cgd.pt).

6. 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).

13th September, 2018

Luis Saraiva Martins
Head of Compliance