

The Wolfsberg Group Anti-Money Laundering Questionnaire 2015/English ⁽¹⁾

I.General AML Policies, Practices and Procedures	Yes	No
1. Is the AML compliance program approved by the BFA's board or a senior committee?	X	
2. Does BFA have a legal and regulatory compliance program that includes a designated officer that is responsible for coordinating and overseeing the AML framework?	X	
3. Has BFA developed written policies documenting the processes that they have in place to prevent, detect and report suspicious transactions?	X	
4. In addition to inspections by the government supervisors/regulators, does the BFA client have an internal audit function or other independent third party that assesses AML policies and practices on a regular basis?	X	
5. Does BFA 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).	X	
6. Does BFA 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?	X	
7. Does BFA have policies covering relationships with Politically Exposed Persons (PEP's), their family and close associates?	X	
8. Does BFA have record retention procedures that comply with applicable law?	X	
9. Are BFA's AML policies and practices being applied to all branches and subsidiaries of BFA both in the home country and in locations outside of that jurisdiction?	X	

II. Risk Assessment	Yes	No
10. Does BFA have a risk-based assessment of its customer base and their transactions?	X	
11. Does BFA determine the appropriate level of enhanced due diligence necessary for those categories of customers and transactions that BFA has reason to believe pose a heightened risk of illicit activities at or through BFA?	X	

III. Know Your Customer, Due Diligence and Enhanced Due Diligence	Yes	No
12. Has BFA implemented processes for the identification of those customers on whose behalf it maintains or operates accounts or conducts transactions?	X	
13. Does BFA have a requirement to collect information regarding its customers' business activities?	X	
14. Does BFA assess its BFA customers AML policies or practices?	X	
15. Does BFA have a process to review and, where appropriate, update customer information relating to high risk client information?	X	
16. Does BFA have procedures to establish a record for each new customer noting their respective identification documents and 'Know Your Customer' Information?	X	
17. Does BFA complete a risk-based assessment to understand the normal and expected transactions of its customers?	X	

IV. Reportable Transactions and Prevention and Detection of Transactions with Illegally Obtained Funds	Yes	No
18. Does BFA have policies or practices for the identification and reporting of transactions that are required to be reported to the authorities?	X	
19. Where cash transaction reporting is mandatory, does BFA have procedures to identify transactions structured to avoid such obligations?	X	
20. Does BFA screen customers and transactions against lists of persons, entities or countries issued by government/competent authorities?	X	
21. Does BFA have policies to reasonably ensure that it only operates with correspondent banks that possess licenses to operate in their countries of origin?	X	
22. Does BFA adhere to the Wolfsberg Transparency Principles and the appropriate usage of the SWIFT MT 202/202COV and MT 205/205COV message formats? ⁽²⁾	X	

V. Transaction Monitoring	Yes	No
23. Does BFA have a monitoring program for unusual and potentially suspicious activity that covers funds transfers and monetary instruments such as travelers checks, money orders, etc?	X	

VI. AML Training	Yes	No
24. Does BFA provide AML training to relevant employees that includes: <ul style="list-style-type: none"> • Identification and reporting of transactions that must be reported to government authorities; • Examples of different forms of money laundering involving BFA's products and services; • Internal policies to prevent money laundering. 	X	
25. Does BFA retain records of its training sessions including attendance records and relevant training materials used?	X	
26. Does BFA communicate new AML related laws or changes to existing AML related policies or practices to relevant employees?	X	
27. Does BFA employ third parties to carry out some of the functions of BFA?		X
28. If the answer to question 27 is yes, BFA does provide AML training to relevant third parties that includes: <ul style="list-style-type: none"> • Identification and reporting of transactions that must be reported to government authorities; • Examples of different forms of money laundering involving BFA's products and services; • Internal policies to prevent money laundering. 	N/A	

Additional information: The answer to question 27 is no, as BFA does not employ third Parties.

(1) The Wolfsberg Group consists of the following leading international financial institutions: Banco Santander, Bank of Tokyo-Mitsubishi UFJ, Barclays, Citigroup, Credit Suisse, Deutsche Bank, Goldman Sachs, HSBC, JP Morgan Chase, Société Générale and UBS which aim to develop financial services industry standards, and related products, for Know Your Customer, Anti-Money Laundering and Counter Terrorist Financing policies.

(2) The four payment message standards to be observed are: I) BFA's should not omit, delete, or alter information in payment messages or orders for the purpose of avoiding detection of that information by any other BFA in the payment process; II) BFA's should not use any particular payment message for the purpose of avoiding detection of information by any other BFA in the payment process; III) Subject to applicable laws, BFA's should cooperate as fully as practicable with other BFA's in the payment process when requesting to provide information about the parties involved; and (IV) BFA's should strongly encourage their correspondent banks to observe these principles. Source: [http://www.wolfsberg-principles.com/pdf/Wolfsberg_NYCH_Statement_on_Payment_Message_Standards_\(2007\).pdf](http://www.wolfsberg-principles.com/pdf/Wolfsberg_NYCH_Statement_on_Payment_Message_Standards_(2007).pdf)

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