

Anti-Money Laundering / Anti-Terrorist Financing Questionnaire

China Construction Bank (Brasil) Banco Múltiplo S/A - CCB Brasil

4440, Brigadeiro Faria Lima Avenue – Itaim Bibi – São Paulo/SP / www.br.ccb.com

Date established 07/1972 / Br Tax Payer Number 07.450.604/0001-89 / GIIN F8XHN7.00000.LE.076 / SWIFT CODE BICBBRSP

Audit Authorities Central Bank of Brazil

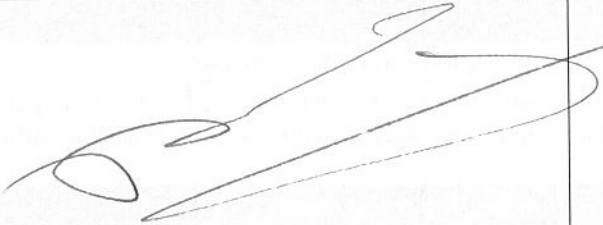
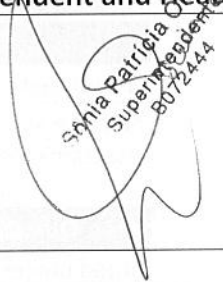
Brazil adhere to the 40 anti-money laundering recommendations and nine especial terrorist financing recommendations developed by the Financial Action Task Force (FATF)

CCB Brasil has never been fined or censured for breach of AML Legislation

CCB Brasil do not conduct business with neither of the six US-sanctioned countries (Burma/Myanmar, Cuba, Iran, North Korea, Sudan and Syria)

I. General AML Policies, Practices and Procedures		Yes	No
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? If "Yes" Please provide their name, position titles, mailing address, telephone number and email address: Sonia Patricia O. Costa (Superintendent and Head AML/CTF) - 4440, Brigadeiro Faria Lima Av. - Itaim Bibi – São Paulo/SP - Brazil - 55 11 2173-9154 - sonia.oliveira@br.ccb.com	<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 inspections by the government supervisors/regulators, does the FI client have an internal audit function or other independent third party 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"/>
II. Risk Assessment		Yes	No
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"/>
III. Know Your Customer, Due Diligence and Enhanced Due Diligence		Yes	No
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"/>
14.	Does the FI assess its FI customers' AML policies or 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"/>

		Yes	No
IV. Reportable Transactions and Prevention and Detection of Transactions with Illegally Obtained Funds			
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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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"/>
V. Transaction Monitoring		Yes	No
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"/>
VI. AML Training		Yes	No
24.	Does the FI 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 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 materials used?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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 checked="" type="checkbox"/>	<input type="checkbox"/>
28.	If the answer to question 27 is yes, does the FI 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 the FI's products and services. • Internal policies to prevent money laundering 	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Name	Claudio Augusto Rotolo	Sonia Patricia O. Costa
Title	Executive Director	Superintendent and Head AML/CTF
Signature		
Date	October 2018	

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