the Wolfsberg Group

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 nine US-sanctioned countries/jurisdiction (Burma/Myanmar, Cuba, Iran, North Korea, Sudan, Syria, Venezuela, Zimbabwe, Crimea/Sevastopol).

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?	☒	☐
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: **Camila Oliveira Bernardo (Superintendent of Compliance)** **camila.bernardo@br.ccb.com** **4440, Brigadeiro Faria Lima Av. - Itaim Bibi – São Paulo/SP - Brazil - 55 11 2173-9154 -**	☒	☐
3. Has the FI developed written policies documenting the processes that they have in place to prevent, detect and report suspicious transactions?	☒	☐
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?	☒	☐
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.)	☒	☐
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?	☒	☐
7. Does the FI have policies covering relationships with Politically Exposed Persons (PEP's), their family and close associates?	☒	☐
8. Does the FI have record retention procedures that comply with applicable law?	☒	☐
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	☒	☐
II. *Risk Assessment*	Yes	No
10. Does the FI have a risk-based assessment of its customer base and their transactions?	☒	☐
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?	☒	☐
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?	☒	☐
13. Does the FI have a requirement to collect information regarding its customers' business activities?	☒	☐
14. Does the FI assess its FI customers' AML policies or practices?	☒	☐
15. Does the FI have a process to review and, where appropriate, update customer information relating to high risk client information?	☒	☐
16. Does the FI have procedures to establish a record for each new customer noting their respective identification documents and 'Know Your Customer' information?	☒	☐
17. Does the FI complete a risk-based assessment to understand the normal and expected transactions of its	☒	☐

customers?		

IV. *Reportable Transactions and Prevention and Detection of Transactions with Illegally Obtained Funds*	**Yes**	**No**
18. Does the FI have policies or practices for the identification and reporting of transactions that are required to be reported to the authorities?	☒	☐
19. Where cash transaction reporting is mandatory, does the FI have procedures to identify transactions structured to avoid such obligations?	☒	☐
20. Does the FI screen customers and transactions against lists of persons, entities or countries issued by government/competent authorities?	☒	☐
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?	☒	☐
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?*	☒	☐
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?	☒	☐
VI. AML Training	**Yes**	**No**
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.	☒	☐
25. Does the FI retain records of its training sessions including attendance records and relevant training materials used?	☒	☐
26. Does the FI communicate new AML related laws or changes to existing AML related policies or practices to relevant employees?	☒	☐
27. Does the FI employ third parties to carry out some of the functions of the FI?	☒	☐
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	☒	☐

Name	**Claudio Augusto Rotolo**
Title	**CRO / CCO Executive Director**
Signature	
Date	