the Wolfsberg Group

Financial Institution Name: Location (Country) :

Banco Finantia, S.A.	
Portugal	

The questionnaire is required to be answered on a Legal Entity (LE) Level. The Financial Institution should answer the questionnaire at the legal entity level including any branches for which the client base, products and control model are materially similar to the LE Head Office. This questionnaire should not cover more than one LE. Each question in the CBDDQ will need to be addressed from the perspective of the LE and on behalf of all of its branches. If a response for the LE differs for one of its branches, this needs to be highlighted and details regarding this difference captured at the end of each sub-section. If a branch's business activity (products offered, client base etc.) is materially different than its Entity Head Office, a separate questionnaire can be completed for that branch.

No #	Question Y & OWNERSHIP	Answer
1	Full Legal Name	
2.	Tuil Legal Name	
		Banco Finantia, S.A.
2	Append a list of foreign branches which are covered by	
	this questionnaire	Banco Finantia, S.A., Sucursal en España.
3	Full Legal (Registered) Address	
		Rua General Firmino Miguel, nr. 5
		1600-100 Lisboa - Portugal
		1000-100 Lisboa - I Ollugai
4	Full Drivery Duninger Address (if different from about)	22
4	Full Primary Business Address (if different from above)	
		N/A.
5	Date of Entity incorporation/establishment	
		28/10/1987
6	Calcut time of autorobin and annual an autorobin about if	
6	Select type of ownership and append an ownership chart if available	
6 a	Publicly Traded (25% of shares publicly traded)	No
6 a1	If Y, indicate the exchange traded on and ticker symbol	
	The second secon	
6 b	Member Owned/Mutual	No
6 c	Government or State Owned by 25% or more	No
6 d	Privately Owned	Yes
6 d1	If Y, provide details of shareholders or ultimate	
oui	beneficial owners with a holding of 10% or more	Banco Finantia shareholders list of 10% or more: i) Finantipar, S.A 39, 58%; ii) Arendelle, S.A 16,54%; (iii)
	beneficial owners with a holding of 10% of more	Natixis - 11,25%; iv) Erste Abwicklungsanstalt - 10,39%;
		Banco Finantia UBO is Mr. António Guerreiro with 78,80% of Finantipar, S.A. sharecapital.
7	% of the Entity's total shares composed of bearer shares	
		0%
	15 III WILLIAM WE US TO III	0/8
8	Does the Entity, or any of its branches, operate under an	
	Offshore Banking License (OBL)?	No
8 a	If Y, provide the name of the relevant branch/es which	
	operate under an OBL	
	100 A to 200 A to 300	
	Dane the Deal, have a Vist of Deal, License or are side	
9	Does the Bank have a Virtual Bank License or provide services only through online channels?	no
10		
10	Name of primary financial regulator/supervisory authority	
		Banco de Portugal
		https://www.bportugal.pt/entidadeautorizada/banco-finantia-sa
11	Provide Legal Entity Identifier (LEI) if available	
	And and	
		2138003Z5ZVN16GFYV70
12	Provide the full legal name of the ultimate parent (if	
12	different from the Entity completing the DDQ)	
	different from the Entity completing the DDQ)	
13	Jurisdiction of licensing authority and regulator of ultimate	
	parent	
		Portugal

14	Colort the hypiness areas and to be to the Follo	Expensive control of the control of
14	Select the business areas applicable to the Entity	
14 a	Retail Banking	No V
14 b	Private Banking	Yes
14 c	Commercial Banking	No
14 d	Transactional Banking	No
14 e	Investment Banking	Yes
14 f	Financial Markets Trading	Yes
14 g	Securities Services/Custody	Yes
14 h	Broker/Dealer	Yes
14 i	Multilateral Development Bank	No
14 j	Wealth Management	No
14 k	Other (please explain)	
		Not Applicable
15	Does the Entity have a significant (10% or more) portfolio	
	of non-resident customers or does it derive more than 10%	
	of its revenue from non-resident customers? (Non-resident	l
	means customers primarily resident in a different	No
	jurisdiction to the location where bank services are	
	provided)	
15 a	If Y, provide the top five countries where the non-resident	
	customers are located.	
16	Select the closest value:	
16 a	Number of employees	51-200
16 b	Total Assets	Greater than \$500 million
17	Confirm that all responses provided in the above Section	Citeater trian \$500 million
17	are representative of all the LE's branches.	Yes
17 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
18	If appropriate, provide any additional information/context to the answers in this section.	Not Applicable
2. PRODU	UCTS & SERVICES	
19	Does the Entity offer the following products and services:	
19 a	Correspondent Banking	Yes
19 a1	lf Y	
19 a1a	Does the Entity offer Correspondent Banking services	M.
	to domestic banks?	No
19 a1b	Does the Entity allow domestic bank clients to provide	No
19 a1c	downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with	No
	domestic banks?	
19 a1d	Does the Entity offer Correspondent Banking services to foreign banks?	No
19 a1e	Does the Entity allow downstream relationships with	No
10 44	foreign banks?	
19 a1f	Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks?	No
19 a1g	Does the Entity offer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTSs)?	No
	Does the Entity allow downstream relationships with	
19 a1h	MSBs, MVTSs, or Payment Service Provider (PSPs)?	
	MSBs, MVTSs, or Payment Service Provider (PSPs)?	No.
19 a1h1	MSBs, MVTSs, or Payment Service Provider (PSPs)? MSBs	No No
	MSBs, MVTSs, or Payment Service Provider (PSPs)?	No No No

19 a1i	Does the Entity have processes and procedures in	
	place to identify downstream relationships with MSBs	No I
	/MVTSs/PSPs?	"
40 h	Cross-Border Bulk Cash Delivery	No.
19 b		No .
19 c	Cross-Border Remittances	No
19 d	Domestic Bulk Cash Delivery	No
19 e	Hold Mail	No
19 f	International Cash Letter	No
19 g	Low Price Securities	No
19 h	Payable Through Accounts	
19 i	Payment services to non-bank entities who may then offer third party payment services to their customers?	No
19 i1	If Y , please select all that apply below?	THE PROPERTY OF THE PROPERTY O
19 i2	Third Party Payment Service Providers	2 - 12 - 12 - 13 - 13 - 13 - 13 - 13 - 1
19 i3	Virtual Asset Service Providers (VASPs)	
19 i4	eCommerce Platforms	
19 i5	Other - Please explain	
19 j	Private Banking	Both
19 k	Remote Deposit Capture (RDC)	Yes
191	Sponsoring Private ATMs	No
19 m	Stored Value Instruments	No
19 n	Trade Finance	No
19 o	Virtual Assets	No
19 p	For each of the following please state whether you offer the service to walk-in customers and if so, the applicable	
	level of due diligence:	A DECEMBER OF THE PROPERTY OF
19 p1	Check cashing service	Yes
19 p1a	If yes, state the applicable level of due diligence	Due Diligence
19 p2	Wire transfers	Yes
19 p2a	If yes, state the applicable level of due diligence	Due Diligence
		Yes
19 p3	Foreign currency conversion	
19 p3a	If yes, state the applicable level of due diligence	Due Diligence
19 p4	Sale of Monetary Instruments	Yes
19 p4a	If yes, state the applicable level of due diligence	A CONTRACTOR OF THE PROPERTY O
19 p5	If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence.	Not Applicable
19 q	Other high-risk products and services identified by the Entity (please specify)	Not Applicable
20	Confirm that all responses provided in the above Section are representative of all the LE's branches.	Yes
20 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
21	If appropriate, provide any additional information/context to the answers in this section.	Explanation to Q.19a): Banco Finantia only provides correspondent banking services to its Spanish branch, Banco Finantia, S.A., Sucursal en España for USD activity. Banco Finantia has processess and procedures to identify downstream relationships with Banco Finantia, S.A., Sucursal en España.
3 AMI CT	F & SANCTIONS PROGRAMME	
22	Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:	
22 a	Appointed Officer with sufficient experience/expertise	Yes
22 b	Adverse Information Screening	Yes
22 c	Beneficial Ownership	Yes
22 d	Cash Reporting	Yes
22 e	CDD	Yes
22 f	EDD	Yes
22 g	Independent Testing	Yes
22 h	Periodic Review	Yes
	Policies and Procedures	
22 i		Yes
22 j	PEP Screening	Yes
22 k	Risk Assessment	Yes
22	Sanctions	Yes

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ird parties to which specific compliance activities bject to ABC risk have been outsourced on-employed workers as appropriate ontractors/consultants) is the Entity provide ABC training that is targeted to cific roles, responsibilities and activities? firm that all responses provided in the above Section representative of all the LE's branches N, clarify which questions the difference/s relate to and	Not Applicable Not Applicable No
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representative of all the LE's branches N, clarify which questions the difference/s relate to and	Yes
N, clarify which questions the difference/s relate to and	
e branch/es that this applies to.	
propriate, provide any additional information/context to	
answers in this section.	
9	
SANCTIONS POLICIES & PROCEDURES	
lations and requirements to reasonably prevent, detect	
report:	
oney laundering	Yes
rrorist financing	Yes
	Yes
	Yes
S. Standards	Yes
Y, does the Entity retain a record of the results?	Yes
	Yes
	Yes
	要求 的是对于1000年的,1000年的,1000年的,1000年的,1000年的1000年的1000年的1000年的1000年的1000年的1000年的1000年的
phibit the opening and keeping of anonymous and	Yes
litious named accounts	160
	Yes
	Yes
	Yes
phibit dealing with another entity that provides services	Yes
phibit opening and keeping of accounts for Section 311	W.
signated entities	Yes
	Yes
uses, casa de cambio, bureaux de change or money	
nsfer agents	
sess the risks of relationships with domestic and	
	Ves
eign PEPs, including their family and close associates	
t si il roll ritt ut tess fill so tilo no o so so si u	SANCTIONS POLICIES & PROCEDURES the Entity documented policies and procedures istent with applicable AML, CTF & Sanctions lations and requirements to reasonably prevent, detect report: ney laundering rorist financing nctions violations he Entity's policies and procedures updated at least ally? the Entity chosen to compare its policies and edures against: S. Standards Y, does the Entity retain a record of the results? Standards Y, does the Entity retain a record of the results? Standards Y, does the Entity retain a record of the results? sinbibit the opening and keeping of anonymous and tious named accounts whibit the opening and keeping of accounts for icensed banks and/or NBFIs whibit dealing with other entities that provide banking vices to unlicensed banks whibit accounts/relationships with shell banks whibit dealing with another entity that provides services shell banks whibit opening and keeping of accounts for Section 311 signated entities whibit opening and keeping of accounts for any of censed/unregulated remittance agents, exchanges uses, casa de cambio, bureaux de change or money

49 i	Define the process for escalating financial crime risk issues/potentially suspicious activity identified by employees	Yes
49 j	Define the process, where appropriate, for terminating existing customer relationships due to financial crime risk	Yes
49 k	Define the process for exiting clients for financial crime reasons that applies across the entity, including foreign	Yes
49 I	branches and affiliates Define the process and controls to identify and handle customers that were previously exited for financial crime reasons if they seek to re-establish a relationship	Yes
49 m	Outline the processes regarding screening for sanctions, PEPs and Adverse Media/Negative News	Yes
49 n	Outline the processes for the maintenance of internal "watchlists"	Yes
50	Has the Entity defined a risk tolerance statement or similar document which defines a risk boundary around their business?	Yes
51	Does the Entity have record retention procedures that comply with applicable laws?	Yes
51 a	If Y, what is the retention period?	5 years or more
52	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
52 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
53	If appropriate, provide any additional information/context to the answers in this section.	Not Applicable
C ANN CT	F & CANCTIONS DISK ASSESSMENT	
	FF & SANCTIONS RISK ASSESSMENT	
54	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:	
54 a	Client	Yes
54 b	Product	Yes
54 c	Channel	Yes
54 d	Geography	Yes
55	Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below:	
55 a	Transaction Monitoring	Yes
55 b	Customer Due Diligence	Yes
55 c	PEP Identification	Yes
55 d	Transaction Screening	Yes
55 e	Name Screening against Adverse Media/Negative News	Yes
55 f	Training and Education	Yes
55 g	Governance	Yes
55 h	Management Information	Yes
56	Has the Entity's AML & CTF EWRA been completed in the last 12 months?	Yes
56 a	If N, provide the date when the last AML & CTF EWRA was completed.	
57	Does the Entity's Sanctions EWRA cover the inherent risk components detailed below:	
57 a	Client	Yes
57 b	Product	Yes
57 c	Channel	Yes
57 d	Geography	Yes
58	Does the Entity's Sanctions EWRA cover the controls	
	effectiveness components detailed helow-	[25] [[일본 : 10] [인트 : 10]
58 a	effectiveness components detailed below:	Yes
58 a 58 b	Customer Due Diligence	Yes Yes
58 b	Customer Due Diligence Governance	Yes
	Customer Due Diligence	

58 e	Name Screening	Yes
58 f	Transaction Screening	Yes
58 g	Training and Education	Yes
59	Has the Entity's Sanctions EWRA been completed in the last 12 months?	Yes
59 a	If N, provide the date when the last Sanctions EWRA was completed.	
60	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
60 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
61	If appropriate, provide any additional information/context to the answers in this section.	Not Applicable
7. KYC, C	DD and EDD	
62	Does the Entity verify the identity of the customer?	Yes
63	Do the Entity's policies and procedures set out when CDD must be completed, e.g. at the time of onboarding or within 30 days?	Yes
64	Which of the following does the Entity gather and retain when conducting CDD? Select all that apply:	
64 a	Customer identification	Yes
64 b	Expected activity	Yes
64 c	Nature of business/employment	Yes
64 d	Ownership structure	Yes
64 e	Product usage	Yes
64 f	Purpose and nature of relationship	Yes
64 g	Source of funds	Yes
64 h	Source of wealth	Yes
65	Are each of the following identified:	
65 a	Ultimate beneficial ownership	Yes
65 a1	Are ultimate beneficial owners verified?	Yes
65 b	Authorised signatories (where applicable)	Yes
65 c	Key controllers	Yes
65 d 66	Other relevant parties What is the Entity's minimum (lowest) threshold applied to	Yes 25%
67	beneficial ownership identification? Does the due diligence process result in customers receiving a risk classification?	Yes
67 a	If Y, what factors/criteria are used to determine the customer's risk classification? Select all that apply:	
67 a1	Product Usage	Yes
67 a2	Geography	Yes
67 a3	Business Type/Industry	Yes
67 a4	Legal Entity type	Yes
67 a5	Adverse Information	Yes
67 a6	Other (specify)	Risk classification can be aggravated in a "case by case" evaluation.
68	of your KYC process?	No
68 a	If Y, is this at:	
68 a1	Onboarding	
68 a2	KYC renewal	
68 a3	Trigger event	
68 a4	Other	
68 a4a	If yes, please specify "Other"	
69	3	Yes
69 a	If Y, is this at:	
69 a1	Onboarding	Yes
69 a2	KYC renewal	Yes

69 a3	Trigger event	Yes
70	What is the method used by the Entity to screen for	Combination of outcometed and manual
	Adverse Media/Negative News?	Combination of automated and manual
71	Does the Entity have a risk based approach to screening	
* *		
	customers and connected parties to determine whether	Yes
	they are PEPs, or controlled by PEPs?	
71 a	If Y, is this at:	[1] 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1.
71 a1	Onboarding	Yes
71 a2	KYC renewal	Yes
Name and Address of the Owner, where the Owner, which is the Owner, where the Owner, where the Owner, which is the Owner, whi	The state of the s	
71 a3	Trigger event	Yes
72	What is the method used by the Entity to screen PEPs?	Combination of submitted and manual
		Combination of automated and manual
73	Dage the Estituteur policies presedures and presence	
13	Does the Entity have policies, procedures and processes	
	to review and escalate potential matches from screening	
	customers and connected parties to determine whether	Yes
	they are PEPs, or controlled by PEPs?	
74	Is KYC renewed at defined frequencies based on risk	
	rating (Periodic Reviews)?	Yes
74		
74 a	If yes, select all that apply:	
74 a1	Less than one year	Yes
74 a2	1 – 2 years	Yes
74 a3	3 – 4 years	Yes
74 a4	5 years or more	Yes
-		
74 a5	Trigger-based or perpetual monitoring reviews	Yes
74 a6	Other (Please specify)	
75	Does the Entity maintain and report metrics on current and	
73		V
	past periodic or trigger event due diligence reviews?	Yes
76	From the list below, which categories of customers or	
	industries are subject to EDD and/or are restricted, or	
	prohibited by the Entity's FCC programme?	
76 a	Arms, defence, military	Always subject to EDD
76 b	Respondent Banks	EDD on risk-based approach
76 b1	If EDD or restricted, does the EDD assessment contain	200 of hole based approach
1001		
	the elements as set out in the Wolfsberg	Yes
	Correspondent Banking Principles 2022?	
76 c	Embassies/Consulates	EDD on risk-based approach
76 d	Extractive industries	Always subject to EDD
76 e	Gambling customers	Always subject to EDD
76 f	General Trading Companies	Always subject to EDD
76 g	Marijuana-related Entities	EDD on risk-based approach
76 h	MSB/MVTS customers	Always subject to EDD
76 i	Non-account customers	Always subject to EDD
76 j		Always subject to EDD
76 k		EDD on risk-based approach
76 I	Nuclear power	Always subject to EDD
76 m		Always subject to EDD
76 n	PEPs	Always subject to EDD
-		
76 o		Always subject to EDD
76 p	1000 C 10	Always subject to EDD
76 q	Precious metals and stones	Always subject to EDD
76 r	Red light businesses/Adult entertainment	Always subject to EDD
		Always subject to EDD
76 s		
76 t		Prohibited
76 u		Always subject to EDD
76 v	Unregulated charities	Always subject to EDD
76 w	Used Car Dealers	EDD on risk-based approach
76 x	Virtual Asset Service Providers	Always subject to EDD
76 y	Other (specify)	Customers with (i) residence, (ii) activity or (iii) income with nexus to a jurisdiction that EU, USA and/or UK
		recommend the application of countermeasures.
		And also clients that have any kind nexus with jurisdictions with the EU and UK qualification "High-risk third
		countries".
77	If restricted, provide details of the restriction	
5.5		
	10	
	1	
70	Dogs EDD require copies business comment and for	
78	Does EDD require senior business management and/or compliance approval?	Yes

Does the Entity have specific procedures for orboarding entities that handle client may such as lawyers, accounted, consultation, real estate appeting? Yes			
entities that hands client money auch as lawyers, accountants, consultants, and existed agents? Does the Entity perform an additional correct or quality money and entities tabelled by EU-22. The appropriate, provide any additional information-corried to and the branches of all the LES branches If a propertial, provide any additional information-corried to and the branches that this ageles to If appropriate, provide any additional information-corried to and the branches that this ageles to If appropriate, provide any additional information-corried to and monitoring processes for the identification and reporting of sections and the entity have the based policies, procedures and monitoring processes for the identification and reporting of sections and the entity have the based policies, procedures and monitoring processes for the identification and reporting of sections and the entity have the based policies, procedures and monitoring processes for the identification and reporting of sections and the entity that is the section. B. MONTORING & REPORTING B. MONTORING	78 a	If Y indicate who provides the approval:	Both
accountants, consultants, real estate appetin? 50 Octor the Entity perform an additional control or quality review on clients abject to EDD? 51 a If N. Centry which questions the difference's relate to and the branch'se that this applies to the branch'se that this applies to the transversion this section. 52 If appropriate, provide any additional information'context to the answers in this section. 53 If A. Centry which questions the difference's relate to and the branch'se that this applies to the answers in this section. 54 If appropriate, provide any additional information'context to the answers in this section. 55 If appropriate, provide any additional information'context to the answers in this section. 56 If appropriate, provide any additional information'context to the answers in this section. 57 These entities have an industry/activity code that, when registered in the Blank's database. The system autoristically assigns them with EDD. 58 MONITORING & REPORTING 59 These entities have an industry/activity code that, when registered in the Blank's database. The system autoristically assigns them with EDD. 50 These entities have an industry/activity code that, when registered in the Blank's database. The system autoristically assigns them with EDD. 50 These entities have an industry/activity code that, when registered in the Blank's database. The system autoristically assigns them with EDD. 51 Automated 52 These entities have an industry/activity code that, when registered in the Blank's database. The system autoristically assigns them with EDD. 51 Automated 52 These entities have an industry/activity code that, when registered in the Blank's database. The system autoristically assigns them with EDD. 52 These entities and information and activity assigns them with EDD. 53 These entities and information and activity assigns them with EDD. 54 Automated 55 These entities and activity and activity and activity and activity assigns them with EDD. 55 These entities and activity and activity and	79		
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Provided to the composition of			
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are regressmative of all the LEs transhes I a N. Calify which questions the difference's relate to and the branchives that this applies to If appropriate, provide any additional information/context to the arrivers in this section. 2. Provide any additional information/context to the arrivers in this section. 2. Does the Entity have rein the based policies, procedures and monitoring processes for the identification and reporting of suspicious activity? 4. What is the method used by the Entity to monition for suscious activity? 4. What is the method used by the Entity to monition for suscious activity? 4. If automated or combination selected, are internal oystem or vendor-sourced tools used? 4. If automated or combination selected, are internal oystem or vendor-sourced tools used? 4. If automated or combination selected, are internal oystem or vendor-sourced tools used? 4. If automated or combination selected, what is the name of the vendor-sourced tools used? 4. If a which we selected is the selected of the selected or source of the selected or source of the selected or source or source of the selected or source or s			117
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### Repropriate, provide any additional information/context to the answers in this section. ### ACMINITORING & REPORTING ### Description of the Entity have risk based policies, procedures and monitoring processes for the identification and reporting of suspicious activity? ### What is the method used by the Entity to monitor terractions from a supplication and adjusted of terractions are monitored manually ### Automated or combination selected, are internal system or verodor-sourced tools used? ### If automated or combination selected, are internal system or verodor-sourced tools used? ### Under State Or Prodit selected, what is the name of the vendor/cool? ### April ### Vendor-sourced tool used? ### Under State Or Prodit selected, what is the name of the vendor/cool? ### April ### Vendor-sourced tool used? ### Under State Or Prodit selected, what is the name of the vendor/cool? ### April ### Vendor-sourced tool used? ### Does the Entity have adjusted or procedures and processes to review and escalate maters arising from the monitoring experiments? ### Does the Entity have policies, procedures and processes to review and escalate maters arising from the monitoring of countries transactions. #### April ### Vesting Terractions and activity? ### Does the Entity have policies, procedures and processes to review and escalate maters arising from the monitoring of countries transactions and activity? #### Does the Entity have policies, procedures and processes to review and escalate maters arising from the monitoring of countries to report and activity? #### Does the Entity have policies, procedures and processes to review and escalate maters arising from the monitoring of countries to remain a strength of the manual and activity? #### Does the Entity have policies, procedures and processes to review and escalate maters arising from the monitoring of countries are active to monitoring the processes of the manual and activity? #### Does the Entity have policies, procedures and internal and activity?	81 a		
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		Transparency Standards?	160

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93	Does the Entity have policies, procedures and processes	
	to comply with and have controls in place to ensure	
93 a	compliance with: FATF Recommendation 16	Yes
93 b	Local Regulations	Yes
93 b1	If Y, specify the regulation	Tes
93 01	ii 1, specify the regulation	Law n.83/2017 and Banco de Portugal Notice n.1/2022.
93 c	If N, explain	
94	Does the Entity have controls to support the inclusion of required and accurate originator information in cross border payment messages?	Yes
95	Does the Entity have controls to support the inclusion of required beneficiary information cross-border payment messages?	Yes
95 a	If Y, does the Entity have procedures to include beneficiary address including country in cross border payments?	Yes
96	Confirm that all responses provided in the above Section	
	are representative of all the LE's branches	Yes
96 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
97	If appropriate, provide any additional information/context to the answers in this section.	Not Applicable
10. SANO	CTIONS	
98	Does the Entity have a Sanctions Policy approved by	I
	management regarding compliance with sanctions law applicable to the Entity, including with respect to its business conducted with, or through accounts held at foreign financial institutions?	Yes
99	Does the Entity have policies, procedures, or other controls reasonably designed to prevent the use of another entity's accounts or services in a manner causing the other entity to violate sanctions prohibitions applicable to the other entity (including prohibitions within the other entity's local jurisdiction)?	Yes
100	Does the Entity have policies, procedures or other controls reasonably designed to prohibit and/or detect actions taken to evade applicable sanctions prohibitions, such as stripping, or the resubmission and/or masking, of sanctions relevant information in cross border transactions?	
101	Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during	Yes
	onboarding and regularly thereafter against Sanctions Lists?	103
102	What is the method used by the Entity for sanctions screening?	Both Automated and Manual
102 a	If 'automated' or 'both automated and manual' selected:	D. H.
102 a1	Are internal system of vendor-sourced tools used?	Both
102 a1a	If a 'vendor-sourced tool' or 'both' selected, what is the name of the vendor/tool?	ngCompliance/Sherlock
102 a2	When did you last test the effectiveness (of finding true matches) and completeness (lack of missing data) of the matching configuration of the automated tool? (If 'Other' please explain in Question 110)	< 1 year
103	Does the Entity screen all sanctions relevant data, including at a minimum, entity and location information, contained in cross border transactions against Sanctions Lists?	Yes
104	What is the method used by the Entity?	Combination of automated and manual
105	Does the Entity have a data quality management programme to ensure that complete data for all	Yes
106	transactions are subject to sanctions screening? Select the Sanctions Lists used by the Entity in its	
106 a	sanctions screening processes: Consolidated United Nations Security Council Sanctions	Used for screening customers and beneficial owners and for filtering transactional data
106 b	List (UN) United States Department of the Treasury's Office of	
100 D	Foreign Assets Control (OFAC)	Used for screening customers and beneficial owners and for filtering transactional data

106 c	Office of Financial Sanctions Implementation HMT	Used for screening customers and beneficial owners and for filtering transactional data
	(OFSI)	
106 d	European Union Consolidated List (EU)	Used for screening customers and beneficial owners and for filtering transactional data
106 e	Lists maintained by other G7 member countries	Not used
106 f	Other (specify)	EDD List of Banco de Portugal (Portuguese Banking Conduct Supervisor) and list provided by judiciary authorities.
107	When regulatory authorities make updates to their Sanctions list, how many business days before the entity updates their active manual and/or automated screening systems against:	
107 a	Customer Data	Same day to 2 business days
107 b	Transactions	Same day to 2 business days
108	Does the Entity have a physical presence, e.g. branches, subsidiaries, or representative offices located in countries/regions against which UN, OFAC, OFSI, EU or G7 member countries have enacted comprehensive jurisdiction-based Sanctions?	No
109	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
109 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
110	If appropriate, provide any additional information/context to the answers in this section.	Not Applicable
11. TRAIN	ING & EDUCATION	
111	Does the Entity provide mandatory training, which includes:	
111 a	Identification and reporting of transactions to government authorities	Yes
111 b	Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered	Yes
111 c	Internal policies for controlling money laundering, terrorist financing and sanctions violations	Yes
111 d	New issues that occur in the market, e.g. significant regulatory actions or new regulations	Yes
111 e	Conduct and Culture	Yes
111 f	Fraud	Yes
112	Is the above mandatory training provided to:	
112 a	Board and Senior Committee Management	Yes
112 b	1st Line of Defence	Yes
112 c	2nd Line of Defence	Yes
112 d	3rd Line of Defence	Yes
112 e	Third parties to which specific FCC activities have been outsourced	Not Applicable
112 f	Non-employed workers (contractors/consultants)	Not Applicable
113	Does the Entity provide AML, CTF & Sanctions training that is targeted to specific roles, responsibilities and high risk products, services and activities?	Yes
114	Does the Entity provide customised training for AML, CTF and Sanctions staff?	Yes
114 a	If Y, how frequently is training delivered?	Annually
115	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes

115 a	If N, clarify which questions the difference/s relate to and	
	the branch/es that this applies to.	
	W655	
116	If appropriate, provide any additional information/context to	
	the answers in this section.	
		Not Applicable
12 OLIALIT	Y ASSURANCE /COMPLIANCE TESTING	
117	Does the Entity have a program wide risk based Quality	
117	Assurance programme for financial crime (separate from	Yes
	the independent Audit function)?	
118	Does the Entity have a program wide risk based	
	Compliance Testing process (separate from the	Yes
	independent Audit function)?	
119	Confirm that all responses provided in the above Section	Yes
	are representative of all the LE's branches	
119 a	If N, clarify which questions the difference/s relate to and	
	the branch/es that this applies to.	
120	If appropriate, provide any additional information/context to	
	the answers in this section.	ALL A STREET
		Not Applicable
13. AUDIT		
121	In addition to inspections by the government	
	supervisors/regulators, does the Entity have an internal	
	audit function, a testing function or other independent third	N.
	party, or both, that assesses FCC AML, CTF, ABC, Fraud	Yes
	and Sanctions policies and practices on a regular basis?	
122	How often is the Entity audited on its AML, CTF, ABC,	1000年1月1日 - 1000年1月1日 - 1000年1月1日 - 1000年1月1日 - 1000年1月1日 - 1000年1日 - 1000年
	Fraud and Sanctions programme by the following:	
122 a	Internal Audit Department	Yearly
122 b	External Third Party	Yearly
123	Does the internal audit function or other independent third	
	party cover the following areas:	
123 a	AML, CTF, ABC, Fraud and Sanctions policy and	Yes
400 5	procedures	
123 b	Enterprise Wide Risk Assessment	Yes
123 c	Governance	Yes
123 d 123 e	KYC/CDD/EDD and underlying methodologies	Yes
123 e	Name Screening & List Management Reporting/Metrics & Management Information	Yes Yes
123 r	Suspicious Activity Filing	Yes
123 g	Technology	Yes
123 i	Transaction Monitoring	Yes
123 j	Transaction Monitoring Transaction Screening including for sanctions	Yes
123 k	Training & Education	Yes
123 K	Other (specify)	
.=- 1		
		Procedures and controls to ensure that Banco Finantia's AML Policy is equally applied in its affiliates.
104	Are advance findings from internal 0 - tamel - 120	
124	Are adverse findings from internal & external audit tracked	Yes
	to completion and assessed for adequacy and	169
125	completeness? Confirm that all responses provided in the above section	
.20	are representative of all the LE's branches	Yes
125 a	If N, clarify which questions the difference/s relate to and	
	the branch/es that this applies to.	
106	If appropriate provide any additional information/	
126	If appropriate, provide any additional information/context to	
	the answers in this section.	Not Applicable
		, tot. pp.oaco
14. FRAUI	D	
127	Does the Entity have policies in place addressing fraud	Yes
	risk?	100
128	Does the Entity have a dedicated team responsible for	Yes
	preventing & detecting fraud?	

129	Does the Entity have real time monitoring to detect fraud?	Yes
130	Do the Entity's processes include gathering additional information to support its fraud controls, for example: IP address, GPS location, and/or device ID?	Yes
131	Confirm that all responses provided in the above section are representative of all the LE's branches	Yes
131 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
132	If appropriate, provide any additional information/context to the answers in this section.	Not Applicable

Declaration Statement

Wolfsberg Group Correspondent Banking Due Diligence Questionnaire 2023 (CBDDQ V1.4)
Declaration Statement (To be signed by Global Head of Correspondent Banking or equivalent position holder AND Group Money Laundering Prevention Officer, Global Head of Anti- Money Laundering,
Chief Compliance Officer, Global Head of Financial Crimes Compliance OR equivalent)

Banco Finantia, S.A. (Financial Institution name) is fully committed to the fight against financial crime and makes every effort to remain in full compliance with all applicable financial crime laws, regulations and standards in all of the jurisdictions in which it does business and holds accounts.

The Financial Institution understands the critical importance of having effective and sustainable controls to combat financial crime in order to protect its reputation and to meet its legal and regulatory

The Financial Institution recognises the importance of transparency regarding parties to transactions in international payments and has adopted/is committed to adopting these standards.

The Financial Institution further certifies it complies with / is working to comply with the Wolfsberg Correspondent Banking Principles and the Wolfsberg Trade Finance Principles. The information provided in this Wolfsberg CBDDQ will be kept current and will be updated no less frequently than every eighteen months.

The Financial Institution commits to file accurate supplemental information on a timely basis.

100

I, Nuno Barata (Global Head of Correspondent Banking or equivalent), certify that I have read and understood this declaration, that the answers provided in this Wolfsberg CBDDQ are complete and correct to my honest belief, and that I am authorised to execute this declaration on behalf of the Financial Institution.

, Pedro Gonçalves (MLRO or equivalent), certify that I have read and understood this declaration, that the answers provided in this Wolfsberg CBDDQ are complete and correct to my honest belief, and that I am authorised to execute this declaration on behalf of the Financial Institution.

(Signature & Date)

(Signature & Date) APRIL 08, 2024

CBDDQ V1.4