the Wolfsberg Group

Financial Institution Name: Location (Country) NOVO BANCO 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	Answer
1. ENTITY	& OWNERSHIP	
1	Full Legal Name	NOVO BANGO S A
		NOVO BANCO S.A.
2	Append a list of foreign branches which are covered	
	by this questionnaire	List of branches attached
3	Full Legal (Registered) Address	
	l on Eugen (magnetoros) mentes	Campus do Novobanco, Avenida Doutor Mário Soares, Taguspark, Edificio 1, 2740-119 Porto Salvo
		Jaivo
4	Full Primary Business Address (if different from	
•	labove)	N.A.
	,	
5	Date of Entity incorporation/establishment	
•	Date of Entity incorporation/establishment	August 3, 2014
6	Select type of ownership and append an ownership	
U	chart if available	
6 a	Publicly Traded (25% of shares publicly traded)	No
6 a 1	If Y, indicate the exchange traded on and ticker	
Uai	symbol	
	1	
6 b	Member Owned/Mutual	No
6 c	Government or State Owned by 25% or more	Yes
6 d	Privately Owned	Yes
6 d1	If Y, provide details of shareholders or ultimate	
	beneficial owners with a holding of 10% or more	Shareholders: Nani Holdings S. A. R. L (privately owned) - 75%
		Resolution Fund (public entity) - 13,54%
		Portuguese State (Direção-Geral do Tesouro e Finanças) - 11,46%
7	% of the Entity's total shares composed of bearer	
	shares	0%
8	Does the Entity, or any of its branches, operate under	
J	an Offshore Banking License (OBL)?	No
8 a	If Y, provide the name of the relevant branch/es	
o a	which operate under an OBL	N/A
9	Does the Bank have a Virtual Bank License or	
3	provide services only through online channels?	No
10	Name of primary financial regulator/supervisory	
	authority	Bank of Portugal, CMVM – Securities Market Commission - Market Regulator, ASF - Portuguese Insurance and Pension Funds Supervisory Authority
	1	Instance and I cholor I onto our crisory harmony
11	Provide Legal Entity Identifier (LEI) if available	
l. .		5493009W2E2YDCXY6S81
	1	
42	Deside the full lead name of the ultimate name of	
12	Provide the full legal name of the ultimate parent (if different from the Entity completing the DDQ)	N/A
	Tumerent from the Emity completing the DDQ)	

13		
	Jurisdiction of licensing authority and regulator of	Portugal
	ultimate parent	rutugai
14	Select the business areas applicable to the Entity	
14 a	Retail Banking	V
	9	Yes
14 b	Private Banking	No
14 c	Commercial Banking	Yes
14 d	Transactional Banking	Yes
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	Yes
14 k	Other (please explain)	
17.6	Cutal (picase explain)	
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 means customers primarily resident in a different jurisdiction to the location where bank services are provided)	No
15 a	If Y, provide the top five countries where the non- resident customers are located,	N/A
16	Select the closest value:	
16 a	Number of employees	1001-5000
16 b	Total Assets	Between \$10 and \$100 million
17	Confirm that all responses provided in the above	
	Section 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.	N/A
18	If appropriate, provide any additional information/context to the answers in this section.	N/A
	UCTS & SERVICES	
2. PRODU	Does the Entity offer the following products and	
19	Does the Entity offer the following products and services:	
19 19 a	Does the Entity offer the following products and services: Correspondent Banking	Yes
19	Does the Entity offer the following products and services: Correspondent Banking If Y	Yes
19 19 a	Does the Entity offer the following products and services: Correspondent Banking If Y Does the Entity offer Correspondent Banking services to domestic banks?	Yes Yes
19 a 19 a 19 a1 19 a1a 19 a1b	Does the Entity offer the following products and services: Correspondent Banking If Y Does the Entity offer Correspondent Banking services to domestic banks? Does the Entity allow domestic bank clients to provide downstream relationships?	
19 a 19 a 19 a1 19 a1a	Does the Entity offer the following products and services: Correspondent Banking If Y Does the Entity offer Correspondent Banking services to domestic banks? Does the Entity allow domestic bank clients to	Yes
19 a 19 a 19 a1 19 a1a 19 a1b	Does the Entity offer the following products and services: Correspondent Banking If Y Does the Entity offer Correspondent Banking services to domestic banks? Does the Entity allow domestic bank clients to provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with	Yes Yes
19 a 19 a 19 a1 19 a1a 19 a1a 19 a1b	Does the Entity offer the following products and services: Correspondent Banking If Y Does the Entity offer Correspondent Banking services to domestic banks? Does the Entity allow domestic bank clients to provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking	Yes Yes Yes
19 a 19 a 19 a1 19 a1a 19 a1b 19 a1c	Does the Entity offer the following products and services: Correspondent Banking If Y Does the Entity offer Correspondent Banking services to domestic banks? Does the Entity allow domestic bank clients to provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking services to foreign banks? Does the Entity allow downstream relationships	Yes Yes Yes Yes
19 a 19 a 19 a1 19 a1a 19 a1b 19 a1c 19 a1d 19 a1e	Does the Entity offer the following products and services: Correspondent Banking If Y Does the Entity offer Correspondent Banking services to domestic banks? Does the Entity allow domestic bank clients to provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking services to foreign banks? Does the Entity allow downstream relationships with foreign banks? Does the Entity allow downstream relationships with foreign banks?	Yes Yes Yes Yes Yes Yes
19 a 19 a 1 a 19 a 1 b 19 a 1 c 19 a 1 d 19 a 1 d 19 a 1 e 19 a 1 f	Does the Entity offer the following products and services: Correspondent Banking If Y Does the Entity offer Correspondent Banking services to domestic banks? Does the Entity allow domestic bank clients to provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking services to foreign banks? Does the Entity allow downstream relationships with foreign banks? Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks? Does the Entity offer Correspondent Banking services to regulated Money Services Businesses	Yes Yes Yes Yes Yes Yes Yes
19 a 19 a 1 a 19 a 1 a 19 a 1 b 19 a 1 c 19 a 1 d 19 a 1 f 19 a 1 g 19 a 1	Does the Entity offer the following products and services: Correspondent Banking If Y Does the Entity offer Correspondent Banking services to domestic banks? Does the Entity allow domestic bank clients to provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking services to foreign banks? Does the Entity allow downstream relationships with foreign banks? Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks? Does the Entity offer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTSs)? Does the Entity allow downstream relationships with MSBs, MVTSs, or Payment Service Provider	Yes Yes Yes Yes Yes Yes Yes
19 a1 19 a1 a 19 a1 a 19 a1 b 19 a1 c 19 a1 c 19 a1 f 19 a1 g 19 a1 f 19 a1 f 19 a1 h	Does the Entity offer the following products and services: Correspondent Banking If Y Does the Entity offer Correspondent Banking services to domestic banks? Does the Entity allow domestic bank clients to provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking services to foreign banks? Does the Entity allow downstream relationships with foreign banks? Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks? Does the Entity offer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTSs)? Does the Entity allow downstream relationships with MSBs, MVTSs, or Payment Service Provider (PSPs)?	Yes Yes Yes Yes Yes Yes No

19 a1i	Does the Entity have processes and procedures	
	in place to identify downstream relationships with	No
	MSBs /MVTSs/PSPs?	110
19 b	Cross-Border Bulk Cash Delivery	No
19 c	Cross-Border Remittances	Yes
19 d	Domestic Bulk Cash Delivery	No No
19 e	Hold Mail	No
19 f	International Cash Letter	Yes
19 g	Low Price Securities	No
19 h	Payable Through Accounts	No
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?	
19 i2	Third Party Payment Service Providers	Please select
19 i3	Virtual Asset Service Providers (VASPs)	Please select
19 i4	eCommerce Platforms	Please select
19 i5	Other - Please explain	
401	Directo Deskins	N-
19]	Private Banking	No
19 k	Remote Deposit Capture (RDC)	No
19 I	Sponsoring Private ATMs	Yes
19 m	Stored Value Instruments	Yes
19 n	Trade Finance	Yes
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:	
19 p1	Check cashing service	Yes
19 p1a	If yes, state the applicable level of due diligence	Due diligence
19 p2	Wire transfers	No
19 p2a	If yes, state the applicable level of due diligence	Please select
19 p3	Foreign currency conversion	Yes
and the same of th		
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	Due diligence
19 p5	If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence.	N/A
19 q	Other high-risk products and services identified by the Entity (please specify)	Art dealers, Real Estate Investments, Travel and Tour Companies, Offshore Banks, General Trading Companies, Precious Metals Dealers, Embassy/Consulate, Charities, Gambling, Used car dealers.
20	Confirm that all responses provided in the above Section are representative of all the LE's branches.	No
20 a	If N, clarify which questions the difference/s relate to	
20 a	and the branch/es that this applies to.	Answers are applicable to the group parent company (Novo Banco).
21	If appropriate, provide any additional information/context to the answers in this section.	N/A
	CTF & 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	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
22 i	Policies and Procedures	Yes
22 j	PEP Screening	Yes
	1	
	Risk Assessment	I Yes
22 k	Risk Assessment Sanctions	Yes Yes

22 m	Suspicious Activity Reporting	Yes
22 m	Training and Education	Yes
22 o	Transaction Monitoring	Yes
23	How many full time employees are in the Entity's AML, CTF & Sanctions Compliance Department?	11-100
24	Is the Entity's AML, CTF & Sanctions policy approved at least annually by the Board or equivalent Senior Management Committee? If N, describe your practice in Question 29.	Yes
25	Does the Board receive, assess, and challenge regular reporting on the status of the AML, CTF, & Sanctions programme?	Yes
26	Does the Entity use third parties to carry out any components of its AML, CTF & Sanctions programme?	No
26 a	If Y, provide further details	N/A
27	Does the entity have a whistleblower policy?	Yes
28	Confirm that all responses provided in the above Section are representative of all the LE's branches	No
28 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	Answers are applicable to the group parent company (Novo Banco).
29	If appropriate, provide any additional information/context to the answers in this section.	N/A
4. ANT	I BRIBERY & CORRUPTION	
30	Has the Entity documented policies and procedures consistent with applicable ABC regulations and requirements to reasonably prevent, detect and report bribery and corruption?	Yes
31	Does the Entity have an enterprise wide programme that sets minimum ABC standards?	Yes
32	Has the Entity appointed a designated officer or officers with sufficient experience/expertise responsible for coordinating the ABC programme?	Yes
33	Does the Entity have adequate staff with appropriate levels of experience/expertise to implement the ABC programme?	Yes
34	Is the Entity's ABC programme applicable to:	Both joint ventures and third parties acting on behalf of the Entity
35	Does the Entity have a global ABC policy that:	
35 a	Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage.	Yes
35 b	Includes enhanced requirements regarding interaction with public officials?	Yes
35 c	Includes a prohibition against the falsification of books and records (this may be within the ABC policy or any other policy applicable to the Legal Entity)?	
36	Does the Entity have controls in place to monitor the effectiveness of their ABC programme?	Yes
37	Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme?	Yes
38	Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months?	Yes
38 a	If N, provide the date when the last ABC EWRA was completed.	N/A
39	Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment?	Yes
40	Does the Entity's ABC EWRA cover the inherent risk components detailed below:	Yes
40 a	Potential liability created by intermediaries and other third-party providers as appropriate	Yes

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that involve state-owned or state-controlled entities or public officials or public officials or controlled entities or public officials or hospitals, whire/informathys, charitable domainns and political contributions. 40 e Changas in business activities that may materially increase the Calaly's convuption risk. 41 Oces the Entity's internal and thindron or other independent firth party cover ARC Policies and Procedures? 42 Oces the Entity internal and thindron or other independent firth party cover ARC Policies and Procedures? 43 Oces the Entity provide mandatory ARC training to: 44 Oces the Entity provide mandatory ARC training to: 45 Tatune of Deferred. 46 Oces the Entity internal training that is suppled to open the ARC risk training that is suppled to open the ARC risk training that is suppled to open the ARC risk training that is suppled to open the ARC risk training that is suppled to open the ARC risk training that is suppled to open the Central or an appropriate provide and the branches to seek for Celes responsibilities and activities? 43 Oces the Entity provide ARC training that is suppled to open the ARC risk training that is suppled to open the ARC risk training that is suppled to open the ARC risk training that is suppled to open the ARC risk training that is suppled to open the ARC risk training that is suppled to open the ARC risk training that is suppled to open the ARC risk training that is suppled to open the ARC risk training that is suppled to open the ARC risk training that is suppled to open the ARC risk training that is suppled to open the ARC risk training that is suppled to open the ARC risk training that is suppled to open the ARC risk training that is suppled to open the ARC risk training that is suppled to open the ARC risk training that is suppled to open the ARC risk training that is suppled to open the ARC risk training that is suppled to open the ARC risk training that is suppled to open the ARC risk training training that is suppled to open the ARC risk training trainin	40 Ь	industries in which the Entity does business, directly	Yes
hospitality, iningrintermahips, charitable donations and political combibitions 40 e Changes in business activities that may materially increase the Entity cover ABC Politics and Procedures? 41 Oces the Entity sintermal audit function or other independent introl party cover ABC Politics and Procedures? 42 Oces the Entity provide mandatory ABC training to: 43 Board and sonior Committee Management. 43 b 1st. Line of Defence. 44 c 2 2 Inc. of Defence. 45 c 2 2 Inc. of Defence. 46 c 3 Third parties to which specific compliance activities subject to ABC risk thave been outstourced. 47 c 1 Non-employed workers as appropriate to specify the provide and activities. 48 c 1 Non-employed workers as appropriate to specific compliance activities. 49 c 2 c 1 Non-employed workers as appropriate to specific roles responsibilities and activities? 40 confirm that all responses provided in the above Section are representabilities and activities? 44 Confirm that all responses provided in the above Section are representabilities and activities? 45 If appropriate, provide any additional informationiconicists to the answers in this section. 46 If appropriate, provide any additional informationiconicists to the answers in this section, and the branchists that this applies to. 55 AML, CTF & SANCTIONS POLICIES & PROCEDURES 46 If appropriate, provide any additional representation of the provide and deport. 47 Are the Entity spoilices and procedures updated and experimentable to the section of the section	40 c	that involve state-owned or state-controlled entities	Yes
Increase the Entity's increase and Entity's complain risk 14	40 d	hospitality, hiring/internships, charitable donations	Yes
Independent hird party cover ABC Policies and Procedures Procedures	40 e		Yes
42 b Seard and senior Committee Management Yes 42 c 2nd Line of Defence Yes 42 c 2nd Line of Defence Yes 42 d 3rd Line of Defence Yes 43 d 3rd Line of Defence Yes 44 c 3rd Line of Defence Yes 45 d 3rd Line of Defence Yes 46 c Senior are representative of all the LEs branches 47 d 3rd Line of Defence Yes 48 d 4rd Line of	41	independent third party cover ABC Policies and	Yes
42 b Seard and senior Committee Management Yes 42 c 2nd Line of Defence Yes 42 c 2nd Line of Defence Yes 42 d 3rd Line of Defence Yes 43 d 3rd Line of Defence Yes 44 c 3rd Line of Defence Yes 45 d 3rd Line of Defence Yes 46 c Senior are representative of all the LEs branches 47 d 3rd Line of Defence Yes 48 d 4rd Line of	42	Does the Entity provide mandatory ABC training to:	
42 b 1st Line of Defence Yes 42 c 2nd Line of Defence Yes 43 d 3rd Line of Defence Yes 43 d 3rd Line of Defence Yes 44 d 5 3rd Line of Defence Yes 45 d 6 3rd Line of Defence Yes 45 d 7 3rd Line of Defence Yes 46 b 1 2rd parties to which specific compliance activities 47 c 2rd Introductions which specific compliance activities 48 c 3 Does the Entity provide ABC risk have been outsourced 49 c 3rd Confirm that all responses provided in the above Section are representative of all the LES branches 44 a 3 If N, Calarity which questions the difference Arelate to and the branchles that this applies to, and the provide and the branchles that this applies to, and the provide and the provides and feet to an advise the provides a			Yes
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Contractors/consultants Yes		Third parties to which specific compliance activities	
to specific roles, responsibilities and activities? 44 a Confirm that all responses provided in the above Section are representative of all the LE's branches of and the branch'es that this applies to. 45 a If appropriate, provide any additional information/context to the answers in this section. 45 If appropriate, provide any additional information/context to the answers in this section. 46 Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: 46 Money laundering 46 Sanctions violations 47 Are the Entity's policies and procedures updated at least annually? 48 Has the Entity chosen to compare its policies and procedures against: 48 J Has the Entity retain a record of the results? 49 Does the Entity have policies and procedures that: 49 a Prohibit the opening and keeping of accounts for uniforensed banks and/or NSFIs 49 C Prohibit dealing with other entities that provide banks and/or NSFIs 49 C Prohibit dealing with other entities that provide sanks excises to shell banks 49 C Prohibit dealing with another entity that provides sevices to shell banks 49 C Prohibit the opening and keeping of accounts for uniforensed banks and/or NSFIs 49 C Prohibit dealing with another entity that provides sevices to shell banks 49 C Prohibit dealing with another entity that provides sevices to shell banks 49 C Prohibit dealing with another entity that provides sevices to unificensed banks and/or NSFIs 49 C Prohibit dealing with other entities that provides sevices to unificensed banks and/or NSFIs 49 C Prohibit dealing with other entities that provides sevices to shell banks 49 C Prohibit dealing with other entities that provides sevices to unificensed banks and/or NSFIs 49 C Prohibit dealing with other entities that provides sevices to unificensed banks and/or NSFIs 49 C Prohibit dealing with other entities that provides sevices to unificensed banks and/or NSFIs 49 C Prohibit dealing with othe	42 f		Yes
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information/context to the answers in this section. S. AML, CTF & SANCTIONS POLICIES & PROCEDURES Has the Entity documented policies and procedures consistent with applicable AMI, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: 46 a Money laundering Yes 46 b Terrorist financing Yes 47 Are the Entity's policies and procedures updated at least annually? 48 As the Entity chosen to compare its policies and procedures against: 48 a U.S. Standards FY Yes 48 b EU Standards FIY, does the Entity retain a record of the results? 9 Obes the Entity have policies and procedures that: 49 a Prohibit the opening and keeping of accounts for unflicensed banks and/or NBFIs 49 c Prohibit dealing with other entities that provide banking services to unflicensed banks 49 c Prohibit dealing with other entities that provide banking services to unflicensed banks 49 c Prohibit dealing with another entity that provides services to shell banks 49 c Prohibit dealing with another entity that provides services to shell banks 49 c Prohibit dealing with another entity that provides services to shell banks 49 c Prohibit dealing with another entity that provides services to shell banks 49 c Prohibit dealing with another entity that provides services to shell banks 49 c Prohibit dealing with another entity that provides services to shell banks 49 c Prohibit dealing with another entity that provides services to shell banks 49 c Prohibit dealing with another entity that provides services to shell banks 49 c Prohibit dealing with another entity that provides services to shell banks 49 c Prohibit dealing with another entity that provides services to shell banks 49 c Prohibit dealing with another entity that provides services to shell banks 49 c Prohibit dealing with another entity that provides services to shell banks 49 c Prohibit dealing with another entity that provides services to shell banks 49 c Prohibit dealing with another entity that provides services to shell banks 49 c Prohibi	44 a		Answers are applicable to the group parent company (Novo Banco).
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Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: 46 a Money laundering Yes 46 b Termist financing Yes 46 c Sanctions violations Yes 47 Are the Entity's policies and procedures updated at least annually? 48 Has the Entity chosen to compare its policies and procedures against: 48 a U.S. Standards Yes 48 at If Y, does the Entity retain a record of the results? Yes 48 b EU Standards Yes 48 b EU Standards Yes 49 Does the Entity have policies and procedures that: 49 a Prohibit the opening and keeping of accounts for unilicensed banks and/or NBFIs 49 c Prohibit dealing with other entities that provide banking services to unilicensed banks 49 d Prohibit dealing with other entities that provides services to shell banks 49 f Prohibit dealing with another entity that provides services to shell banks 49 g Prohibit depening and keeping of accounts for Section 31 t designated entities 49 g Prohibit opening and keeping of accounts for Section 31 t designated entities keeping of accounts for onlicensed banks and/or NBFIs yes 49 g Prohibit opening and keeping of accounts for Section 31 t designated entities keeping of accounts for onlicensed banks ball banks 49 g Prohibit opening and keeping of accounts for Section 31 t designated entities keeping of accounts for onlicensed banks houses, casa de cambio, bureaux de change or money transfer agents 49 h Assess the risks of relationships with domestic and	5 AMI C	TE & SANCTIONS DOLICIES & PROCEDURES	
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least annually? 48	46 c	Sanctions violations	Yes
procedures against: 48 a U.S. Standards (If Y, does the Entity retain a record of the results? Yes 48 b EU Standards (If Y, does the Entity retain a record of the results? Yes 49 Does the Entity have policies and procedures that: 49 a Prohibit the opening and keeping of anonymous and fictitious named accounts 49 b Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs 49 c Prohibit dealing with other entities that provide banking services to unlicensed banks 49 d Prohibit dealing with another entity that provides services to shell banks 49 d Prohibit dealing with another entity that provides services to shell banks 49 e Prohibit dealing with another entity that provides services to shell banks 49 f Prohibit opening and keeping of accounts for Section 311 designated entities 49 g Prohibit opening and keeping of accounts for any of unlicensed/unregulated remittance agents, exchanges houses, casa de cambio, bureaux de change or money transfer agents 49 h Assess the risks of relationships with domestic and	47		Yes
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48 b1 If Y, does the Entity retain a record of the results? 49 Does the Entity have policies and procedures that: 49 a Prohibit the opening and keeping of anonymous and fictitious named accounts 49 b Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs 49 c Prohibit dealing with other entities that provide banking services to unlicensed banks 49 d Prohibit accounts/relationships with shell banks 49 e Prohibit dealing with another entity that provides services to shell banks 49 f Prohibit opening and keeping of accounts for Section 311 designated entities 49 g Prohibit opening and keeping of accounts for any of unlicensed/unregulated remittance agents, exchanges houses, casa de cambio, bureaux de change or money transfer agents 49 h Assess the risks of relationships with domestic and	48 a1	If Y, does the Entity retain a record of the results?	Yes
49 Does the Entity have policies and procedures that: 49 a Prohibit the opening and keeping of anonymous and fictitious named accounts 49 b Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs 49 c Prohibit dealing with other entities that provide banking services to unlicensed banks 49 d Prohibit accounts/relationships with shell banks 49 e Prohibit dealing with another entity that provides services to shell banks 49 f Prohibit opening and keeping of accounts for Section 311 designated entities 49 g Prohibit opening and keeping of accounts for any of unlicensed/unregulated remittance agents, exchanges houses, casa de cambio, bureaux de change or money transfer agents 49 h Assess the risks of relationships with domestic and	48 b	EU Standards	Yes
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49 a Prohibit the opening and keeping of anonymous and ficultious named accounts 49 b Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFls 49 c Prohibit dealing with other entities that provide banking services to unlicensed banks 49 d Prohibit accounts/relationships with shell banks 49 d Prohibit dealing with another entity that provides services to shell banks 49 e Prohibit dealing with another entity that provides services to shell banks 49 f Prohibit opening and keeping of accounts for Section 311 designated entities 49 g Prohibit opening and keeping of accounts for any of unlicensed/unregulated remittance agents, exchanges houses, casa de cambio, bureaux de change or money transfer agents 49 h Assess the risks of relationships with domestic and			
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49 e Prohibit dealing with another entity that provides services to shell banks 49 f Prohibit opening and keeping of accounts for Section 311 designated entities 49 g Prohibit opening and keeping of accounts for any of unlicensed/unregulated remittance agents, exchanges houses, casa de cambio, bureaux de change or money transfer agents 49 h Assess the risks of relationships with domestic and	49 d		Yes
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49 g Prohibit opening and keeping of accounts for any of unlicensed/unregulated remittance agents, exchanges houses, casa de cambio, bureaux de change or money transfer agents 49 h Assess the risks of relationships with domestic and	49 f	Prohibit opening and keeping of accounts for	Yes
	49 g	Prohibit opening and keeping of accounts for any of unlicensed/unregulated remittance agents, exchanges houses, casa de cambio, bureaux de	
associates Yes	49 h	foreign PEPs, including their family and close	Yes

49 î	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 branches and affiliates	Yes
491	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	No
52 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	Answers are applicable to the group parent company (Novo Banco),
53	If appropriate, provide any additional information/context to the answers in this section,	N/A
6. AML, C	TF & SANCTIONS RISK ASSESSMENT Does the Entity's AML & CTF EWRA cover the	
34	inherent risk components detailed below:	
54 a	Client	Yes
54 b	Product	Yes Yes
54 c 54 d	Channel Geography	Yes
55	Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below:	
55 a	Transaction Monitoring	
55 b		Yes
	Customer Due Diligence	Yes Yes
55 c	PEP Identification	
55 d	PEP Identification Transaction Screening	Yes
55 d 55 e	PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News	Yes Yes Yes Yes
55 d 55 e 55 f	PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education	Yes Yes Yes Yes Yes
55 d 55 e 55 f 55 g	PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance	Yes Yes Yes Yes Yes Yes Yes
55 d 55 e 55 f	PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed	Yes Yes Yes Yes Yes
55 d 55 e 55 f 55 g 55 h	PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information	Yes Yes Yes Yes Yes Yes Yes Yes Yes
55 d 55 e 55 f 55 g 55 h	PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF	Yes
55 d 55 e 55 f 55 g 55 h 56	PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent	Yes
55 d 55 e 55 f 55 g 55 h 56 a 57 a 57 a	PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product	Yes
55 d 55 e 55 f 55 g 55 h 56 a 57 a 57 a 57 c	PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel	Yes
55 d 55 e 55 f 55 g 55 h 56 56 a 57 57 a 57 b 57 c 57 d	PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography	Yes
55 d 55 e 55 f 55 g 55 h 56 56 a 57 57 a 57 b 57 c 57 d 58	PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below:	Yes
55 d 55 e 55 f 55 g 55 h 56 56 a 57 57 a 57 a 57 c 57 d 58 58 a	PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: Customer Due Diligence	Yes
55 d 55 e 55 f 55 g 55 h 56 56 a 57 57 a 57 b 57 c 57 d 58	PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below:	Yes

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,	N/A
60	Confirm that all responses provided in the above Section are representative of all the LE's branches	No
60 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	N/A
61	If appropriate, provide any additional information/context to the answers in this section,	N/A
7. KYC.	CDD 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 Are each of the following identified:	Yes
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	Other relevant parties	Yes
66	What is the Entity's minimum (lowest) threshold applied to beneficial ownership identification?	25%
67	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:	A TORS TO BE WHAT AND A TOP AS AN ADMINISTRATION OF THE PARTY OF THE P
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)	PEP / RCA (personal and professional relationships) / OTCPP (holders of other public and political positions provided for in Portuguese law.
68	For high risk non-individual customers, is a site visit a part of your KYC process?	No
68 a	If Y, is this at:	
68 a1	Onboarding	Please select
68 a2	KYC renewal	Please select
68 a3	Trigger event	Please select
68 a4 68 a4a	Other If yes, please specify "Other"	Please select
69	Does the Entity have a risk based approach to screening customers for Adverse Media/Negative News?	Yes
69 a	If Y, is this at:	
69 a1	Onboarding	Yes
69 a2	KYC renewal	Yes

Cn =2	Trigger quent	Yes
69 a3	Trigger event	res
70	What is the method used by the Entity to screen for 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 they are PEPs, or controlled by PEPs?	Yes
71 a	If Y, is this at:	
71 a1	Onboarding	Yes
71 a2	KYC renewal	Yes
71 a3	Trigger event	Yes
72	What is the method used by the Entity to screen PEPs?	Combination of automated and manual
73	Does the Entity have policies, procedures and processes to review and escalate potential matches from screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?	Yes
74	Is KYC renewed at defined frequencies based on risk rating (Periodic Reviews)?	Yes
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	Olher (Please specify)	
75	Does the Entity maintain and report metrics on current and 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	Restricted
76 b	Respondent Banks	Always subject to EDD
76 b1	If EDD or restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022?	Yes
76 c	Embassies/Consulates	Always subject to EDD
76 d	Extractive industries	Always subject to EDD
76 e	Gambling customers	Always subject to EDD
76 f	General Trading Companies	EDD on risk-based approach
76 g	Marijuana-related Entities	Prohibited
76 h	MSB/MVTS customers	Always subject to EDD
76 i	Non-account customers	Always subject to EDD
76 j	Non-Government Organisations	Always subject to EDD
76 k	Non-resident customers	EDD on risk-based approach
761		Always subject to EDD
	Nuclear power	
76 m	Payment Service Providers	Always subject to EDD
76 n	PEPs	Always subject to EDD
76 o	PEP Close Associates	Always subject to EDD
76 p	PEP Related	Always subject to EDD
76 q	Precious metals and stones	Always subject to EDD
76 r	Red light businesses/Adult entertainment	Prohibited
	Regulated charities	Always subject to EDD
76 s	2	
76 t	Shell banks	Prohibited
76 u	Travel and Tour Companies	Always subject to EDD
76 v	Unregulated charities	Prohibited
76 w	Used Car Dealers	Always subject to EDD
76 x	Virtual Asset Service Providers	Prohibited
76 y	Other (specify)	
77	If restricted, provide details of the restriction	The Portuguese legislation identify a list of companies which are allowed to produce and trade arms and material related to defense and military, Novo Banco has established in its internal rules that no business are conduct with any other entity beside of those listed.
78	Does EDD require senior business management and/ or compliance approval?	Yes

The company of the co	70	T IOV:- I:ttid (b	
onbearding entires that it and/or clean transpared has lawyers, accordants, considering, real postes against to guality review or desires subject to ECD? 15 Confirm that all responses provided in the above. 16 Confirm that all responses provided in the above. 17 Confirm that all responses provided in the above. 18 Confirm that all responses provided in the above. 18 Confirm that all responses provided in the above. 19 Confirm that all responses provided in the above. 19 Confirm that all responses provided in the above. 10 Confirm that all responses provided in the above. 10 Confirm that all responses provided in the above. 10 Confirm that all responses provided in the above. 10 Confirm that all responses provided in the above. 10 Confirm that all responses provided in the above. 10 Confirm that all responses provided in the above. 11 Confirmation that the applies to the analysis applicable to the group parent company (Novo Banco). 12 Confirmation that the applies to the analysis applicable to the group parent company (Novo Banco). 13 Confirmation that the applies to the analysis applicable to the group parent company (Novo Banco). 14 Confirmation that the applies to the analysis applicable to the group parent company (Novo Banco). 15 Confirmation that the applies to the analysis applicable to the analysis and analysis analysis and analysis analysis and analysis analy	78 a	If Y indicate who provides the approval:	Compliance
lawyers, accountains, consultants, real estate agents?	79		No
Does the Entity perform an additional control or quilty review on clients to buy to the EDD? 15 Confirm that all asponsase provided in the above Section are representative of all the LES transfers. No. 16 Another than the asponsase provided in the above Section are representative of all the LES transfers. No. 17 Andrew mind development of all the LES transfers. No. 18 AMONITORING & REPORTING 18 Does the Entity have risk based policions, procedures and monitoring processes for the Mediciation and appropriate disapproved and the processes for the Mediciation and appropriate disapproved and processes for the Mediciation and approved disapproved and approved and ap			INO .
quality review on clients subject to EDD? 18 Confirm that all responses provided if the back Section are representative of all the LEV branches 19 III. (All Andrews Andrews and Confirm that this applies to and the branches that this applies to and the branches that this applies to the group parent company (Novo Banco). 18 dispropriate, provide any additional information formation to the answers in this section. 18 dispropriate, provide any additional information formation to the answers in this section. 19 Does the Entity have reak based policies, procedures reported or supplies and subject or monitor and the process of the group parent company (Novo Banco). 20 Does the Entity have reak based policies, procedures reported of subjects and subject or monitor and annually system or world-resources book used? 24 If automated or combination selected, specilly what type of transactions are enoithered manually system or world-resources book used? 25 If automated or combination of faths relateded, what is the name of the wind-resource book used? 26 If when was the tool lest updated? 27 Other - Please explain (in Cuestion 91) 28 Does the Entity have regulation yrequirements to report suspicious transactions? 28 Does the Entity have regulation yrequirements to report suspicious transactions? 29 Does the Entity have a data quality from the monitoring of customer transactions and adviving requirements to report suspicious transactions? 29 Does the Entity have processes in place to respond to Request For Information (RFIs) from other entities in a first from material regulations and adviving requirements or a stock manual regulation and adviving the monitoring of customer transactions are adjusted from monitoring? 29 Does the Entity have processes in place to respond to Request For Information (RFIs) to their customers in a first from the entity to a place for Information (RFIs) to the customers in a first from the world from the monitoring? 29	80		
Section are representative of all the LE branches			Yes
Section are representative of all the LE branches	81	Confirm that all responses provided in the above	
And the branchiles that this applies to Answers are application on the group patient company views tasted. If appropriate, provide any additional information/context to the answers in this section. MA MONITORING & REPORTING 2. Does the Entity have risk based policies, procedures and reporting of suspicious activity? 3. Monitoring of cuspicious activity? 3. What is the method used by the Entity to monitor provide any additional information of combination selected, specify what type of transactions for suspicious activities? 3. If warmand or combination selected, specify what type of transactions are monitored manually varied and manually applications that calliforms are monitored manually applications that calliforms selected, what is the name of the vendor/tool? 3. When was the bol lest updated? 3. When was the bol lest updated? 3. When was the bol lest updated? 3. When was the submated Transaction Monitoring application hat calliforms are monitoring of updated and manually applications had calliforms and the provided activities and provided and transactions are subjected to the provided and transaction and activity. 3. Pay Manual Provided any additional information and the provided and the provided and the provided and p			No
If appropriate, provide any additional information functional provides any additional information-functional provides any additional information-functional provides any additional informational provides and monitoring processes for the identification and reporting of suspicious addivities.	81 a	If N, clarify which questions the difference/s relate to	Anguera are applicable to the group earent company (New Banca)
Information/context to the answers in this section. No.		and the branch/es that this applies to	Answers are applicable to the group parent company (Novo Banco).
Information/context to the answers in this section. No.			
Information/context to the answers in this section. No.			
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92 Does the Entity adhere to the Wolfsberg Group		information/context to the answers in this section.	
92 Does the Entity adhere to the Wolfsberg Group			
92 Does the Entity adhere to the Wolfsberg Group			
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Payment Transparency Standards?	92		Yes
		Payment Transparency Standards?	

93	Does the Entity have policies, procedures and processes to comply with and have controls in place to ensure compliance with:	
93 a	FATF Recommendation 16	Yes
93 b	Local Regulations	Yes
93 b1	If Y, specify the regulation	Law 58/2020 of 31 August, transposes Directive (EU) 2018/843 of the European Parliament and of the Council of 30 May 2018, Law 83/2017 (Combat Money Laundering Unlawful Benefits and Financing of Terrorism) and Notice 1/2023 - Bank of Portugal (AML, KYC Requirements and Account Opening Requirements).
93 c	If N, explain	N/A
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	No
96 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	Answers are applicable to the group parent company (Novo Banco).
97	If appropriate, provide any additional information/context to the answers in this section.	N/A
10. SAN	CTIONS	Americania de la compania de la comp
98	Does the Entity have a Sanctions Policy approved by 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?	Yes
101	Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists?	Yes
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:	
102 a1	Are internal system of vendor-sourced tools used?	Vendor-sourced lools
102 a1a	If a 'vendor-sourced tool' or 'both' selected, what is the name of the vendor/tool?	Fircosoft
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?	Automated

105	Does the Entity have a data quality management programme to ensure that complete data for all transactions are subject to sanctions screening?	Yes
106	Select the Sanctions Lists used by the Entity in its sanctions screening processes:	
106 a	Consolidated United Nations Security Council Sanctions List (UN)	Used for screening customers and beneficial owners and for filtering transactional data
106 b	United States Department of the Treasury's Office of Foreign Assets Control (OFAC)	Used for screening customers and beneficial owners and for filtering transactional data
106 с	Office of Financial Sanctions Implementation HMT (OFSI)	Used for screening customers and beneficial owners and for filtering transactional data
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	Used for screening customers and beneficial owners and for filtering transactional data
106 f	Other (specify)	FAFT/GAFI, UK-HM TREASURY, USPA Section 311, Fincen, IQCBI-EH
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	No
109 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	Answers are applicable to the group parent company (Novo Banco)
110	If appropriate, provide any additional information/context to the answers in this section,	N/A
	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 112 c	1st Line of Defence 2nd Line of Defence	Yes 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?	
	Does the Entity provide customised training for AML,	
114	CTF and Sanctions staff?	Yes
114 114 a		Yes Annually

115 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	Answers are applicable to the group parent company (Novo Banco).
116	If appropriate, provide any additional information/context to the answers in this section.	N/A
12. QUALIT	Y ASSURANCE /COMPLIANCE TESTING	
117	Does the Entity have a program wide risk based Quality Assurance programme for financial crime (separate from the independent Audit function)?	Yes
118	Does the Entity have a program wide risk based Compliance Testing process (separate from the independent Audit function)?	Yes
119	Confirm that all responses provided in the above Section are representative of all the LE's branches	No
119 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to,	Answers are applicable to the group parent company (Novo Banco),
120	If appropriate, provide any additional information/context to the answers in this section,	N/A
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 party, or both, that assesses FCC AML, CTF, ABC, Fraud and Sanctions policies and practices on a regular basis?	Yes
122	How often is the Entity audited on its AML, CTF, ABC, 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 procedures	Yes
123 b	Enterprise Wide Risk Assessment	Yes
123 c 123 d	Governance KYC/CDD/EDD and underlying methodologies	Yes Yes
123 u	Name Screening & List Management	Yes
123 f	Reporting/Metrics & Management Information	Yes
123 g	Suspicious Activity Filing	Yes
123 h	Technology	Yes
123 i	Transaction Monitoring	Yes
123 j	Transaction Screening including for sanctions	Yes Yes
123 k 123 l	Training & Education Other (specify)	Tes
124	Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness?	Yes
125	Confirm that all responses provided in the above section are representative of all the LE's branches	No
125 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to-	Answers are applicable to the group parent company (Novo Banco).
126	If appropriate, provide any additional information/context to the answers in this section.	N/A
14. FRAU	ID	
127	Does the Entity have policies in place addressing fraud risk?	Yes
128	Does the Entity have a dedicated team responsible for preventing & detecting fraud?	Yes

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.	Answers are applicable to the group parent company (Novo Banco)"
132	If appropriate, provide any additional information/context to the answers in this section.	N/A

	information/context to the answers in this section.	THE CONTRACTOR OF THE CONTRACT		
<u>Declaratio</u>	n Statement			
Declaration Sta	p Correspondent Banking Due Diligence Questionnaire 2023 (CE alement (To be signed by Global Head of Correspondent Bank aundering, Chief Compliance Officer, Global Head of Financial	ting or equivalent position holder AND Group Money Laundering Prevention Officer, Global Head of		
Novo Banco S every effort to	I mancial matter	ion name) is fully committed to the fight against financial crime and makes s, regulations and standards in all of the jurisdictions in which it does business and holds accounts.		
	nstitution understands the critical importance of having effectivatory obligations.	ve and sustainable controls to combat financial crime in order to protect its reputation and to meet its		
The Financial Institution recognises the importance of transparency regarding parties to transactions in international payments and has adopted/is committed to adopting these standards.				
		y with the Wolfsberg Correspondent Banking Principles and the Wolfsberg Trade Finance Principles. vill be updated no less frequently than every eighteen months.		
The Financial I	nstitution commits to file accurate supplemental information or	a timely basis.		
Paulo Franc the answers po Institution.	(Closel riced to	of Correspondent Banking or equivalent), certify that I have read and understood this declaration, that my honest belief, and that I am authorised to execute this declaration on behalf of the Financial		
		ivalent), certify that I have read and understood this declaration, that the answers provided in this am authorised to execute this declaration on behalf of the Financial Institution.		
30	10.09.221 (Signature & Dat	e)		
	- 30.09.34 (Signature & Dat	e)		