



Dear Sirs,

Concerning measures and procedures for the Prevention of Money Laundering and Know Your Customer policies, as adopted by CAIXA CENTRAL – Caixa Central de Crédito Agrícola Mútuo, C.R.L., the Caixas de Crédito Agrícola and auxiliary companies that are part of the Crédito Agrícola Financial Group, hereinafter collectively referred to as “Crédito Agrícola”, we are pleased to provide you with the following

Compliance Statement

- A.** CAIXA CENTRAL – Caixa Central de Crédito Agrícola Mútuo, C.R.L. is a universal bank in the form of a co-operative credit institution registered with the Registrar of banks of Banco de Portugal, the Portuguese Central Bank, and incorporated in the Portuguese Republic, a member country of FATF/GAFI.

Access to banking activities is duly regulated by Laws, Law-Decreets and special Regulations issued, respectively, by the Portuguese Parliament, the Portuguese Government and Banco de Portugal.

The Caixas de Crédito Agrícola are smaller co-operative credit institutions that are legally restrained in terms of geographic expansion; their financial activity is also legally contained: they may not, for example, conduct international business, nor do they have direct access to the domestic financial markets and clearing, activities wherein they are represented by Caixa Central, as required by law. Caixa Central is 100% owned by a group of (currently) 80 Caixas. Caixa Central is empowered by Banco de Portugal with the supervision, guidance and, if need be, intervention in the Caixas that are part of the Crédito Agrícola Financial Group, meaning the SICAM – Sistema Integrado do Crédito Agrícola Mútuo. All the corporations that are part of the Crédito Agrícola Financial Group are 100% Portuguese. All the Caixas are co-operatives owned by close to 400.000 members.

The Crédito Agrícola Financial Group operates in Portugal through a network of about 670 domestic branches and is a statutory cross-guarantee system as pertains to Caixa Central and the Caixas.

Historically, the modern form of Crédito Agrícola was created by Decree of 1st of March 1911, followed by Law 215 in 1914 and Law-Decree 5219 in 1919, but its roots can be traced as far back as 1498 (Holy Mercy Organizations) and 1576 (Community Barns).

With regard to legal requirements, Crédito Agrícola has always followed a policy of strict compliance.

- B.** You may obtain all the institutional, economic and financial information on Crédito Agrícola at its institutional web site <http://www.creditoagricola.com>; please note that you can access various information (namely Annual Reports, Due Diligence & Compliance information, and contacts) at the part of the web site written in English. In Portuguese, however, you may find all the information on the group's identification details, branch network, main lines of business and products offered to our 1.5 million customers.
- C.** As regards the official rules currently in force, the following legislation is in full force:
- 1.** Law 83/2017, originated by the Portuguese Parliament (in compliance with the most recent EU Directives and FATF/GAFI Recommendations), which establishes the prevention regime and the regime of repression of illegally obtained advantages.
 - 2.** Regulation (Aviso) 2/2018, issued by Banco de Portugal, which establishes the regulations and rules applicable to Financial Institutions for the prevention of money laundering and the requirements to which Financial Institutions must comply, in order to open accounts in their books, reinforcing the requirements of previously established KYC policies and procedures.
 - 3.** Portuguese Securities Commission (CMVM) Regulation 2/2007, republished by CMVM Regulation 12/2018, which establishes the rules to be followed by Financial Institutions in the realm of their activity as financial intermediates, including procedures for account opening, commercial relations and AML.

Crédito Agrícola complies with all the above legislation, instructions and regulations, which it has duly and timely transposed into internal norms and divulged at head office level and throughout its branch network.

- D.** As regards the Group's activities, internal structure and action in the field of Money Laundering Prevention, please note the following:
- 1.** Crédito Agrícola's global policy is strict compliance with all the legal requirements, paying special attention to any regulations concerning the Prevention of Money Laundering and Financing of Terrorism.

- 2.** The main elements of the Group's money laundering prevention policy, which include the Know Your Customer principles, are as follows:
 - a)** Full identification of customers and their activities, moving beyond the mere submission of documentation, which must always be comprehensive and cover not only personal identification but also the economic activity of customers or would be customers.
 - b)** Rollout of the prevention culture to all Group employees via specific training activities and periodic reminders.
 - c)** Detection of suspicious operations via the use of specific scanning software.
 - d)** Strong involvement of staff that is close to the customer and/or its operations and are knowledgeable of the customer's profile.
 - e)** Review of the above elements by the Group's internal auditors.

The Compliance Department is responsible for putting in place the Group's prevention policies and internal control procedures, as regards the Prevention of Money Laundering and Terrorism Financing. These policies and procedures are described in the manuals on operations with customers, which are available at all our branches in Portugal and via the Corporate Intranet.

The Compliance Department analyses all operations detected by any member of the organization and/or by the automatic tracking system; based on the results of the investigation, the Compliance Department makes the necessary recommendations, which are binding for each specific case, including the legally required reporting of the finding to the Financial Crimes Unit of the Portuguese Investigating Police (Polícia Judiciária) and to the Public Prosecution Service (Ministério Público), which is responsible for criminal investigation in general.

If applicable, all details of the findings are sent in writing to the Financial Crimes Unit of Polícia Judiciária and Ministério Público, as well as, when required, the relevant Supervising Unit of Banco de Portugal and will normally include, when possible, the following data:



- a)** Identification of the parties involved in the operations (including the characterization of customers as pep);
- b)** Description of the operations;
- c)** Signs of money laundering and terrorism financing;
- d)** Procedures and checks performed.

The most salient aspects of these Money Laundering Prevention policies are as follows:

- a)** Anonymous or numbered accounts neither exist nor are allowed at any level of the Group companies and/or their operations and/or transactions.
- b)** The Crédito Agrícola Financial Group has no business relations with shell banks (or other banks that have relations with shall banks) and investigates all such possible cases prior to completion of transactions.
- c)** The Crédito Agrícola Financial Group keeps a permanently updated list of persons and organizations suspected of criminal activity, obtained from the information furnished by the Federal Reserve, the relevant European Union bodies, the Portuguese Government, the Portuguese Banking Association, Banco de Portugal, OFAC and also by the Compliance Officer via information from other sources. This list is available at the branches via the Corporate Intranet and must be referred to prior to opening an account. Moreover, periodic searches are performed in the corporate database in order to trace persons or organizations included in subsequent updates of the said lists.
- d)** The Crédito Agrícola Financial Group has implemented software tools, which allow, among other functions, the automatic issuance of alerts, their treatment and the automation of enhanced due diligence procedures.

E. Should you have any questions concerning either the contents of this Statement or the Compliance function, please contact us through e-mail address dc.compliance.cccam@creditoagricola.pt.

Yours Faithfully,

Helena Aparício (Mrs.)
Head Of Compliance

Lisbon, 20th, February, 2019

A handwritten signature in blue ink that reads 'Helena Aparício'.