the Wolfsberg Group

Financial Institution Name: Location (Country) :

BRAZA BANK S.A BANCO DE CÂMBIO

BRASIL

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.

	ent than its Entity Head Office, a separate questionnaire can be completed	
No#	Question & OWNERSHIP	Answer
1. ENIII Y	Full Legal Name	
•	Full Legal Name	
		BRAZA BANK S.A. BANCO DE CAMBIO
2	Append a list of foreign branches which are covered by	
_	this questionnaire	
	, '	BRAZA BANK S.A. DOESN'T HAVE ANY FOREIGN BRANCHES
3	Full Legal (Registered) Address	
		DUA DIODO DOM IGOE COO CO ANDAD DATEL CUIDITIDA DE DESTU COMO COO
		RUA BISPO DOM JOSE, 2095, 6º ANDAR, BATEL, CURITIBA - PR - BRAZIL, 80440-080
4	Full Primary Business Address (if different from above)	
		N/A
		IVA
5	Date of Entity incorporation/establishment	
		25/nov/13
6	Select type of ownership and append an ownership chart	
U	if available	
6 a	Publicly Traded (25% of shares publicly traded)	No
6 a1	If Y, indicate the exchange traded on and ticker	
	symbol	
6 b	Member Owned/Mutual	No
6 c	Government or State Owned by 25% or more	W
6 d 6 d1	Privately Owned If Y, provide details of shareholders or ultimate	Yes
oui	beneficial owners with a holding of 10% or more	
		MARCELO LUIZ SACOMORI (92,50% SHARES) - DOB: 28/MAY/1975 IN FOZ DO IGUAÇU - PR - BRAZIL
7	% of the Entity's total shares composed of bearer shares	
	·	
		NONE
8	Does the Entity, or any of its branches, operate under an	No
	Offshore Banking License (OBL)?	
8 a	If Y, provide the name of the relevant branch/es	
	which operate under an OBL	N/A
9	Does the Bank have a Virtual Bank License or provide	
3	services only through online channels?	yes
10	Name of primary financial regulator/supervisory authority	
		CENTRAL BANK OF BRAZIL ('BACEN'')
		CENTRAL BANK OF BRAZIL ('BACEN")
11	Provide Legal Entity Identifier (LEI) if available	
		549300XZU1BJG07ES12
10	Provide the full legal name of the ultimate name ("	
12	Provide the full legal name of the ultimate parent (if different from the Entity completing the DDQ)	
	a	N/A
13	Jurisdiction of licensing authority and regulator of	
	ultimate parent	
		N/A
14	Select the business areas applicable to the Entity	
14 a	Retail Banking	Yes

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14 b	Private Banking	No
14 c	Commercial Banking	Yes
14 d	Transactional Banking	No
14 e	Investment Banking	No
14 f	Financial Markets Trading	No
14 g	Securities Services/Custody	No
14 h	Broker/Dealer	No
14 i	Multilateral Development Bank	No
14 j	Wealth Management	No
14 k	Other (please explain)	
		ESPECIALIZED IN FOREING EXCHANGE AND INTERNATIONAL PAYMENTS
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	51-200
16 b	Total Assets	Between \$10 and \$100 million
17	Confirm that all responses provided in the above Section	Detween 410 and 4100 million
	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.	
2 DRODI	ICTS & SERVICES	
19	Does the Entity offer the following products and services:	
10.0	Correspondent Banking	Yes
19 a 19 a1	If Y	165
	Does the Entity offer Correspondent Banking	
19 a1a		Yes
19 a1b	services to domestic banks? Does the Entity allow domestic bank clients to	No
19 a1c	provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with downstria banks?	No
19 a1d	domestic banks? Does the Entity offer Correspondent Banking	Yes
19 a1e	services to foreign banks? Does the Entity allow downstream relationships	No
40.545	with 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
19 a1h	Does the Entity allow downstream relationships with MSBs, MVTSs, or Payment Service Provider (PSPs)?	
19 a1h1	MSBs	No
19 a1h2	MVTSs	No .
19 a1h3	PSPs	No

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19 a1i	Does the Entity have processes and procedures	
		No
	MSBs /MVTSs/PSPs?	
19 b	Cross-Border Bulk Cash Delivery	No
19 c	Cross-Border Remittances	Yes
19 d	Domestic Bulk Cash Delivery	No
19 e	Hold Mail	No No
	International Cash Letter	No No
19 f		
19 g	Low Price Securities	No .
<u>19 h</u>		No 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		No
19 i3	Virtual Asset Service Providers (VASPs)	No .
19 i4		No
19 i5	Other - Please explain	
	·	
19 j	Private Banking	No
19 k	Remote Deposit Capture (RDC)	No .
19 I	Sponsoring Private ATMs	No
19 m	Stored Value Instruments	No
19 n		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:	
19 p1		No
19 p1a	If yes, state the applicable level of due diligence	
19 p2	Wire transfers	Yes
19 p2a	If yes, state the applicable level of due diligence	
19 p2a		
		Voc
	Foreign currency conversion	Yes
19 p3a	If yes, state the applicable level of due diligence	Due Diligence
19 p3a 19 p4	If yes, state the applicable level of due diligence Sale of Monetary Instruments	
19 p3a 19 p4 19 p4a	If yes, state the applicable level of due diligence Sale of Monetary Instruments If yes, state the applicable level of due diligence	Due Diligence
19 p3a 19 p4	If yes, state the applicable level of due diligence Sale of Monetary Instruments If yes, state the applicable level of due diligence If you offer other services to walk-in customers please provide more detail here, including	Due Diligence
19 p3a 19 p4 19 p4a	If yes, state the applicable level of due diligence Sale of Monetary Instruments If yes, state the applicable level of due diligence If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify)	Due Diligence No
19 p3a 19 p4 19 p4a 19 p5	If yes, state the applicable level of due diligence Sale of Monetary Instruments If yes, state the applicable level of due diligence If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches.	Due Diligence No N/A
19 p3a 19 p4 19 p4a 19 p5	If yes, state the applicable level of due diligence Sale of Monetary Instruments If yes, state the applicable level of due diligence If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	Due Diligence No N/A N/A
19 p3a 19 p4 19 p4a 19 p5	If yes, state the applicable level of due diligence Sale of Monetary Instruments If yes, state the applicable level of due diligence If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	Due Diligence No N/A N/A Yes
19 p3a 19 p4 19 p4a 19 p5 19 q 20 20 a	If yes, state the applicable level of due diligence Sale of Monetary Instruments If yes, state the applicable level of due diligence If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section.	Due Diligence No N/A N/A Yes N/A
19 p3a 19 p4 19 p4a 19 p5 19 q 20 20 a	If yes, state the applicable level of due diligence Sale of Monetary Instruments If yes, state the applicable level of due diligence If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section.	Due Diligence No N/A N/A Yes N/A
19 p3a 19 p4 19 p4a 19 p5 19 q 20 20 a 21	If yes, state the applicable level of due diligence Sale of Monetary Instruments If yes, state the applicable level of due diligence If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section.	Due Diligence No N/A N/A Yes N/A N/A
19 p3a 19 p4 19 p4a 19 p5 19 q 20 20 a 21 3. AML, CT 22 a	If yes, state the applicable level of due diligence Sale of Monetary Instruments If yes, state the applicable level of due diligence If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. F & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise	Due Diligence No N/A N/A Yes N/A N/A Yes
19 p3a 19 p4 19 p4a 19 p5 19 q 20 20 a 21 3. AML, CT 22 a 22 b	If yes, state the applicable level of due diligence Sale of Monetary Instruments If yes, state the applicable level of due diligence If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. F & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening	Due Diligence No N/A N/A Yes N/A Yes Yes Yes
19 p3a 19 p4 19 p4a 19 p5 19 q 20 20 a 21 3. AML, CT 22 22 a 22 b 22 c	If yes, state the applicable level of due diligence Sale of Monetary Instruments If yes, state the applicable level of due diligence If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. F & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership	Due Diligence No N/A N/A Yes N/A Yes Yes Yes Yes Yes Yes
19 p3a 19 p4 19 p4a 19 p5 19 q 20 20 a 21 3. AML, CT 22 a 22 b	If yes, state the applicable level of due diligence Sale of Monetary Instruments If yes, state the applicable level of due diligence If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. F & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership	Due Diligence No N/A N/A Yes N/A V/S N/A N/A N/A N/A Yes N/A Yes Yes Yes Yes
19 p3a 19 p4 19 p4a 19 p5 19 q 20 20 a 21 3. AML, CT 22 22 a 22 b 22 c	If yes, state the applicable level of due diligence Sale of Monetary Instruments If yes, state the applicable level of due diligence If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. F & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership	Due Diligence No N/A N/A Yes N/A Yes Yes Yes Yes Yes Yes
19 p3a 19 p4 19 p4a 19 p5 19 q 20 20 a 21 3. AML, CT 22 22 a 22 b 22 c 22 d	If yes, state the applicable level of due diligence Sale of Monetary Instruments If yes, state the applicable level of due diligence If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. F & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting	Due Diligence No N/A N/A N/A Yes N/A Ves Yes Yes Yes Yes Yes Yes Yes
19 p3a 19 p4 19 p4a 19 p5 19 q 20 20 a 21 21 22 a 22 b 22 c 22 d 22 e 22 f	If yes, state the applicable level of due diligence Sale of Monetary Instruments If yes, state the applicable level of due diligence If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. F & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD	Due Diligence NO N/A N/A Yes N/A N/A Yes Yes Yes Yes Yes Yes Yes Ye
19 p3a 19 p4 19 p4a 19 p5 19 q 20 20 a 21 22 a 22 b 22 c 22 d 22 c 22 f 22 g	If yes, state the applicable level of due diligence Sale of Monetary Instruments If yes, state the applicable level of due diligence If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. F & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing	Due Diligence N/A N/A N/A N/A N/A N/A Yes N/A N/A Yes Yes Yes Yes Yes Yes No Yes Yes Yes Yes Yes Yes Yes Ye
19 p3a 19 p4 19 p4a 19 p5 19 q 20 20 a 21 22 a 22 b 22 c 22 d 22 e 22 f 22 g 22 h	If yes, state the applicable level of due diligence Sale of Monetary Instruments If yes, state the applicable level of due diligence If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. F & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting CDD Independent Testing Periodic Review	Due Diligence N/A N/A N/A N/A N/A Yes N/A Yes Yes Yes Yes Yos No Yes Yes Yes Yes Yes Yes Yes Ye
19 p3a 19 p4 19 p4a 19 p5 19 q 20 20 a 21 22 a 22 b 22 c 22 d 22 e 22 f 22 g 22 h 22 i	If yes, state the applicable level of due diligence Sale of Monetary Instruments If yes, state the applicable level of due diligence If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. F & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing Periodic Review Policies and Procedures	Due Diligence No N/A N/A N/A Yes N/A Yes N/A Ves N/A Yes Yes Yes Yes Yes Yes Yes Ye
19 p3a 19 p4 19 p4 19 p5 19 q 20 20 a 21 22 a 22 b 22 c 22 d 22 e 22 f 22 g 22 h 22 i 22 j	If yes, state the applicable level of due diligence Sale of Monetary Instruments If yes, state the applicable level of due diligence If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. F & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting CDD Independent Testing Periodic Review Policies and Procedures PEP Screening	Due Diligence NO N/A N/A Yes N/A N/A
19 p3a 19 p4 19 p4a 19 p5 19 q 20 20 a 21 3. AML, CT 22 22 a 22 b 22 c 22 d 22 e 22 f 22 g 22 h 22 i	If yes, state the applicable level of due diligence Sale of Monetary Instruments If yes, state the applicable level of due diligence If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. F & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing Periodic Review Policies and Procedures PEP Screening Risk Assessment	Due Diligence No N/A N/A N/A Yes N/A Ves N/A N/A Yes N/A Yes Yes Yes Yes Yes Yes Yes Ye

22 m	Suspicious Activity Reporting	Yes
22 n	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?	Yes
26 a	If Y, provide further details	FOR INDEPENT TESTING
27	Does the entity have a whistleblower policy?	Yes
28	Confirm that all responses provided in the above Section	
20	are representative of all the LE's branches	Yes
28 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
29	If appropriate, provide any additional information/context to the answers in this section.	
4 ANTIR	RIBERY & 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:	Not Applicable
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 с	Includes a prohibition against the falsification of books and records (this may be within the ABC policy or any	Yes
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.	
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:	
40 a	Potential liability created by intermediaries and other third-party providers as appropriate	Yes
40 b	Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries	Yes
40 c	Transactions, products or services, including those that involve state-owned or state-controlled entities or public officials	Yes
40 d	Corruption risks associated with gifts and hospitality, hiring/internships, charitable donations and political contributions	Yes

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40 e	Changes in business activities that may materially increase the Entity's corruption risk	Yes
41	Does the Entity's internal audit function or other independent third party cover ABC Policies and	Yes
42	Procedures? Does the Entity provide mandatory ABC training to:	
42 42 a	Board and senior Committee Management	Yes
42 b	1st Line of Defence	Yes
42 c	2nd Line of Defence	Yes
42 d	3rd Line of Defence	Yes
42 e	Third parties to which specific compliance activities subject to ABC risk have been outsourced	Not Applicable
42 f	Non-employed workers as appropriate (contractors/consultants)	Not Applicable
43	Does the Entity provide ABC training that is targeted to specific roles, responsibilities and activities?	Yes
44	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
44 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
45	If appropriate, provide any additional information/context to the answers in this section.	
5. AML, (CTF & SANCTIONS POLICIES & PROCEDURES	
46	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	Terrorist financing	Yes
46 c	Sanctions violations	Yes
47	Are the Entity's policies and procedures updated at least	
	annually?	Yes
48	Has the Entity chosen to compare its policies and procedures against:	
48 a	U.S. Standards	No
48 a1	If Y, does the Entity retain a record of the results?	
48 b	EU Standards	No
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	Yes
49 b	Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs	Yes
49 c	Prohibit dealing with other entities that provide banking services to unlicensed banks	Yes
49 d	Prohibit accounts/relationships with shell banks	Yes
49 e	Prohibit dealing with another entity that provides services to shell banks	Yes
49 f	Prohibit opening and keeping of accounts for Section 311 designated entities	Yes
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	Yes
49 h	Assess the risks of relationships with domestic and foreign PEPs, including their family and close	Yes
	associates	

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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 branches and affiliates	Yes
49 I	Define the process and controls to identify and	
	handle customers that were previously exited for	Yes
	financial crime reasons if they seek to re-establish a relationship	
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	Yes
	comply with applicable laws?	165
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	
33	to the answers in this section.	
6. AML, CT	TF & SANCTIONS RISK ASSESSMENT	
6. AML, C	TF & SANCTIONS RISK ASSESSMENT Does the Entity's AML & CTF EWRA cover the inherent	
54	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:	
54 54 a	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client	Yes
54 a 54 b	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product	Yes
54 a 54 b 54 c	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client	
54 a 54 b	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls	Yes Yes
54 a 54 b 54 c 54 d 55	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring	Yes Yes
54 a 54 b 54 c 54 d 55 a 55 b	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence	Yes Yes Yes Yes Yes Yes Yes
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Signature Screening			rrespondent Banking Due Diligence Questionnaire (CBDDQ) V1.4
59 Street Entirely Survivors EWRA been completed in the Set X minimal	58 e	Name Screening	Yes
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What is the Entity's minimum (lowest) threshold applied to beneficial ownership identification? Does the due diligence process result in customers receiving a risk classification? If Y, what factors/criteria are used to determine the customer's risk classification? Select all that apply: For all Product Usage Yes For a2 Geography Yes For a3 Business Type/Industry Yes For a4 Legal Entity type Yes For a5 Adverse Information Yes For a6 Other (specify) For high risk non-individual customers, is a site visit a part of your KYC process? If Y, is this at: Ba a If Y, is this at: For boes the Entity have a risk based approach to screening customers for Adverse Media/Negative News? For a If Y, is this at: Ba a If Y, is this at: Ga a If Y, is this at: By at Onboarding Yes For adverse Media/Negative News?	65 c	Key controllers	Yes
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To beneficial ownership identification? Possible diligence process result in customers receiving a risk classification? Yes	66		10%
receiving a risk classification? 67 a			
If Y, what factors/criteria are used to determine the customer's risk classification? Select all that apply: Freduct Usage	67		Yes
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) 68 For high risk non-individual customers, is a site visit a part of your KYC process? 68 a If Y, is this at: 68 a1 Onboarding Yes 68 a2 KYC renewal Yes 68 a3 Trigger event Yes 68 a4 Other 68 a4 Other 68 a4 Other 69 Does the Entity have a risk based approach to screening customers for Adverse Media/Negative News? 69 a If Y, is this at: 69 a If Y, is this at: 69 a1 Onboarding Yes 69 a1 Onboarding Yes	67 a		
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67 a4 Legal Entity type Yes 67 a5 Adverse Information Yes 67 a6 Other (specify) 68 For high risk non-individual customers, is a site visit a part of your KYC process? 68 a If Y, is this at: 68 a1 Onboarding Yes 68 a2 KYC renewal Yes 68 a3 Trigger event Yes 68 a4 Other 69 Does the Entity have a risk based approach to screening customers for Adverse Media/Negative News? 69 a If Y, is this at: 69 a If Y, is this at: 69 a1 Onboarding Yes	67 a2		Yes
67 a6 Adverse Information Yes 67 a6 Other (specify) 68 For high risk non-individual customers, is a site visit a part of your KYC process? 68 a If Y, is this at: 66 a1 Onboarding Yes 68 a2 KYC renewal Yes 68 a3 Trigger event Yes 68 a4 Other 68 a5 If yes, please specify "Other" 69 Does the Entity have a risk based approach to screening customers for Adverse Media/Negative News? 69 a If Y, is this at: 69 a1 Onboarding Yes			
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part of your KYC process? 68 a	67 a6	Other (specify)	
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part of your KYC process? 68 a		For black with a section of the distribution of the section of the	
68 a If Y, is this at: 68 a1 Onboarding Yes 68 a2 KYC renewal Yes 68 a3 Trigger event Yes 68 a4 Other 68 a4a If yes, please specify "Other" 69 Does the Entity have a risk based approach to screening customers for Adverse Media/Negative News? 69 a If Y, is this at: 69 a1 Onboarding Yes	68		Yes
68 a1 Onboarding Yes 68 a2 KYC renewal Yes 68 a3 Trigger event Yes 68 a4 Other 68 a4a If yes, please specify "Other" 69 Does the Entity have a risk based approach to screening customers for Adverse Media/Negative News? 69 a If Y, is this at: 69 a1 Onboarding Yes	68 a		
68 a2 KYC renewal Yes 68 a3 Trigger event Yes 68 a4 Other 68 a4a If yes, please specify "Other" 69 Does the Entity have a risk based approach to screening customers for Adverse Media/Negative News? 69 a If Y, is this at: 69 a1 Onboarding Yes			Yes
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69 Does the Entity have a risk based approach to screening customers for Adverse Media/Negative News? 69 a If Y, is this at: 69 a1 Onboarding Yes			
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customers for Adverse Media/Negative News? Yes 69 a			
69 a If Y, is this at: 69 a1 Onboarding Yes	69	Does the Entity have a risk based approach to screening	
69 a1 Onboarding Yes		customers for Adverse Media/Negative News?	Yes
69 a1 Onboarding Yes			
			V
09 42 NTO reflewar Tes			
	09 aZ	NTO renewal	1169

	Triange arrant	lv _a ,
69 a3	Trigger event	Yes
70	What is the method used by the Entity to screen for	Automated
71	Adverse Media/Negative News? Does the Entity have a risk based approach to screening	
/1		
	customers and connected parties to determine whether they are PEPs, or controlled by PEPs?	Yes
	uney are FEFS, or controlled by PEPS?	
71 a	If Y, is this at:	
71 a1	Onboarding	Yes
71 a2	KYC renewal	Yes
71 a2 71 a3	Trigger event	Yes
71 as	What is the method used by the Entity to screen PEPs?	TES .
12	What is the method used by the Entity to screen FEFS!	Automated
70	Dana the Catity have noticing proceedures and	
73	Does the Entity have policies, procedures and	
	processes to review and escalate potential matches	Yes
	from screening customers and connected parties to determine whether they are PEPs, or controlled by	165
	PEPs?	
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	11-2-
74 a3	3 – 4 years	
74 a4	5 years or more	
74 a5	Trigger-based or perpetual monitoring reviews	Yes
74 a6	Other (Please specify)	
1440	o and (in loaded opening)	
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	Prohibited
76 b	Respondent Banks	EDD on risk-based approach
76 b1	If EDD or restricted, does the EDD assessment	
	contain 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	EDD on risk-based approach
76 e	Gambling customers	EDD on risk-based approach
76 f	General Trading Companies	Prohibited
76 g	Marijuana-related Entities	Prohibited
76 h	MSB/MVTS customers	Prohibited
76 i	Non-account customers	Prohibited
76 j	Non-Government Organisations	Prohibited
76 k	Non-resident customers	EDD on risk-based approach
76 I	Nuclear power	Prohibited
76 m	Payment Service Providers	EDD on risk-based approach
76 n	PEPs	EDD on risk-based approach
76 o	PEP Close Associates	EDD on risk-based approach
76 p	PEP Related	EDD on risk-based approach
76 q	Precious metals and stones	EDD on risk-based approach
76 r	Red light businesses/Adult entertainment	Prohibited
76 s		Prohibited
	Regulated charities	
/b t	Regulated charities Shell banks	Prohibited
76 t 76 u	Shell banks	
76 u		Prohibited EDD on risk-based approach Prohibited
76 u 76 v	Shell banks Travel and Tour Companies	EDD on risk-based approach
76 u 76 v 76 w	Shell banks Travel and Tour Companies Unregulated charities Used Car Dealers	EDD on risk-based approach Prohibited EDD on risk-based approach
76 u 76 v 76 w 76 x	Shell banks Travel and Tour Companies Unregulated charities Used Car Dealers Virtual Asset Service Providers	EDD on risk-based approach Prohibited
76 u 76 v 76 w	Shell banks Travel and Tour Companies Unregulated charities Used Car Dealers	EDD on risk-based approach Prohibited EDD on risk-based approach
76 u 76 v 76 w 76 x	Shell banks Travel and Tour Companies Unregulated charities Used Car Dealers Virtual Asset Service Providers	EDD on risk-based approach Prohibited EDD on risk-based approach
76 u 76 v 76 w 76 x	Shell banks Travel and Tour Companies Unregulated charities Used Car Dealers Virtual Asset Service Providers	EDD on risk-based approach Prohibited EDD on risk-based approach
76 u 76 v 76 w 76 x 76 y	Shell banks Travel and Tour Companies Unregulated charities Used Car Dealers Virtual Asset Service Providers Other (specify)	EDD on risk-based approach Prohibited EDD on risk-based approach
76 u 76 v 76 w 76 x	Shell banks Travel and Tour Companies Unregulated charities Used Car Dealers Virtual Asset Service Providers	EDD on risk-based approach Prohibited EDD on risk-based approach
76 u 76 v 76 w 76 x 76 y	Shell banks Travel and Tour Companies Unregulated charities Used Car Dealers Virtual Asset Service Providers Other (specify)	EDD on risk-based approach Prohibited EDD on risk-based approach
76 u 76 v 76 w 76 x 76 y	Shell banks Travel and Tour Companies Unregulated charities Used Car Dealers Virtual Asset Service Providers Other (specify)	EDD on risk-based approach Prohibited EDD on risk-based approach
76 u 76 v 76 w 76 x 76 y	Shell banks Travel and Tour Companies Unregulated charities Used Car Dealers Virtual Asset Service Providers Other (specify)	EDD on risk-based approach Prohibited EDD on risk-based approach
76 u 76 v 76 w 76 x 76 y	Shell banks Travel and Tour Companies Unregulated charities Used Car Dealers Virtual Asset Service Providers Other (specify) If restricted, provide details of the restriction	EDD on risk-based approach Prohibited EDD on risk-based approach EDD on risk-based approach
76 u 76 v 76 w 76 x 76 y	Shell banks Travel and Tour Companies Unregulated charities Used Car Dealers Virtual Asset Service Providers Other (specify)	EDD on risk-based approach Prohibited EDD on risk-based approach

78 a	If Y indicate who provides the approval:	Both
79	Does the Entity have specific procedures for onboarding	DOM:
	entities that handle client money such as lawyers,	Yes
	accountants, consultants, real estate agents?	
80	Does the Entity perform an additional control or quality review on clients subject to EDD?	Yes
81	Confirm that all responses provided in the above Section	Yes
91.0	are representative of all the LE's branches	
81 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to	
82	If appropriate, provide any additional information/context to the answers in this section.	
8. MONITO	ORING & REPORTING	
83	Does the Entity have risk based policies, procedures and	
	monitoring processes for the identification and reporting of suspicious activity?	Yes
84	What is the method used by the Entity to monitor transactions for suspicious activities?	Combination of automated and manual
84 a	If manual or combination selected, specify what type	
	of transactions are monitored manually	HIGH RISK TRANSACTIONS
84 b	If automated or combination selected, are internal system or vendor-sourced tools used?	Internal System
84 b1	If 'Vendor-sourced tool' or 'Both' selected, what is the name of the vendor/tool?	
84 b2	When was the tool last updated?	
84 b3	When was the automated Transaction Monitoring application last calibrated?	
85	Does the Entity have regulatory requirements to report suspicious transactions?	Yes
85 a	If Y, does the Entity have policies, procedures and processes to comply with suspicious transaction reporting requirements?	Yes
86	Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity?	Yes
87	Does the Entity have a data quality management programme to ensure that complete data for all transactions are subject to monitoring?	Yes
88	Does the Entity have processes in place to respond to Request For Information (RFIs) from other entities in a timely manner?	Yes
89	Does the Entity have processes in place to send Requests for Information (RFIs) to their customers in a timely manner?	Yes
90	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
90 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to	
91	If appropriate, provide any additional information/context to the answers in this section.	
9 РАУМЕ	NT TRANSPARENCY	
92	Does the Entity adhere to the Wolfsberg Group Payment	Van
-	Transparency Standards?	Yes

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	LEI 9613
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	Yes
96 a	are representative of all the LE's branches If N, clarify which questions the difference/s relate to	
30 a	and the branch/es that this applies to.	
97	If appropriate, provide any additional information/context to the answers in this section.	
40 CANOT	CIONIC	
10. SANCT 98	Does the Entity have a Sanctions Policy approved by	
30	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	Yes
102	Lists? 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?	Both
102 a1a	If a 'vendor-sourced tool' or 'both' selected, what is the name of the vendor/tool?	Vendor-sourced: Lexis Nexis/World Check/AML duediligence.com.br; Manual: Google
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)	1-2 years
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 transactions are subject to sanctions screening?	Yes
106	Select the Sanctions Lists used by the Entity in its	
106 a	sanctions screening processes: 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	Licard for corporating customers and honoficial current and for filtering transactional data
	Foreign Assets Control (OFAC)	Used for screening customers and beneficial owners and for filtering transactional data

		rrespondent Banking Due Diligence Questionnaire (CBDDQ) V1.4
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 (i.e. reference data)
106 e	Lists maintained by other G7 member countries	Not used
106 f	Other (specify)	BRAZILIAN OFFICIAL PEP LIST
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.	
11. TRAINI	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
<u>112 f</u>	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	Yes

	Wollsberg Group Co	orrespondent Banking Due Diligence Questionnaire (CBDDQ) V1.4
115 a	If N, clarify which questions the difference/s relate to	
	and the branch/es that this applies to.	
116	If appropriate, provide any additional information/context	
	to the answers in this section.	
	Y ASSURANCE /COMPLIANCE TESTING	
117	Does the Entity have a program wide risk based Quality	Vaa
	Assurance programme for financial crime (separate from the independent Audit function)?	
118	Does the Entity have a program wide risk based	
	Compliance Testing process (separate from the	Yes
440	independent Audit function)?	
119	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
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.	
13. AUDIT	In the second of	
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,	Yes
	Fraud and Sanctions policies and practices on a regular	
122	hasis? How often is the Entity audited on its AML, CTF, ABC,	
122	Fraud and Sanctions programme by the following:	
122 a	Internal Audit Department	Yearly
122 b	External Third Party	Component based reviews
123	Does the internal audit function or other independent	
123 a	third party cover the following areas: AML, CTF, ABC, Fraud and Sanctions policy and	
123 a	procedures	Yes
123 b	Enterprise Wide Risk Assessment	Yes
123 c	Governance	Yes
123 d	KYC/CDD/EDD and underlying methodologies	Yes
123 e 123 f	Name Screening & List Management Reporting/Metrics & Management Information	Yes Yes
123 g	Suspicious Activity Filing	Yes
123 h	Technology	Yes
123 i	Transaction Monitoring	Yes
123 j	Transaction Screening including for sanctions	Yes
123 k 123 l	Training & Education Other (specify)	Yes
1231	Guier (specify)	
124	Are adverse findings from internal & external audit	
	tracked to completion and assessed for adequacy and	Yes
105	completeness?	
125	Confirm that all responses provided in the above section 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.	
126	If appropriate, provide any additional information/context	
	to the answers in this section.	
14. FRAUI		
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

Wolfsberg Group Correspondent Banking Due Diligence Questionnaire (CBDDQ) V1.4		
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.	
Declarati	on Statement	
Declaration Chief Comp	liance Officer, Global Head of Financial Crimes Compliance OR ed	ng or equivalent position holder AND Group Money Laundering Prevention Officer, Global Head of Anti- Money Laundering,
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 obligations.		
The Financial Institution recognises the importance of transparency regarding parties to transactions in international payments and has adopted/is committed to adopting these standards.		
	al Institution further certifies it complies with / is working to comply this Wolfsberg CBDDQ will be kept current and will be updated no	with the Wolfsberg Correspondent Banking Principles and the Wolfsberg Trade Finance Principles. The information less frequently than every eighteen months.
The Financial Institution commits to file accurate supplemental information on a timely basis.		
I, (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.		
I,FLAVIO FUKUMOTO (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.		
	CURITIBA, 08th May 2023 (Signature & Date	
	(Signature & Date	