
Anti-Money Laundering / Anti-Terrorist Financing - Policy Summary

Banco Bradesco Europa S.A., pursuant to the best corporate governance practices, and aiming at protecting the Bank and its Offices, Shareholders, Clients and Employees, establishes an Anti-Money Laundering – Anti-Terrorist Financing Policy. This policy is applicable for all Banco Bradesco Europa entities.

All the employees of Banco Bradesco Europa S.A. must be committed in the fight against money laundering and terrorist financing, preventing the Bank from being used for these illicit practices. They must also promptly report any suspicious money laundering or terrorist financing transactions to the Chief Compliance Officer and Money Laundering Reporting Officers.

The purpose of the Anti-Money Laundering – Anti-Terrorist Financing Policy and related controls is to establish principles in order to:

- Ensure the compliance of the Bank with the laws, rules and regulations, which address the prevention and the fight against money laundering and terrorist financing;
- Ensure the compliance of the Bank with the internal policies of Money Laundering Prevention, establishment of new business relationships and/or opening of new accounts and other related controls;
- Minimize operational, legal and reputation risks to which the Bank may be subject in the event it is used for money laundering or terrorist financing purposes, by means of the adoption of an effective transaction monitoring system, procedures and internal controls;
- Protect the Bank's reputation and image;
- Clearly identify and designate the responsibilities and assignments throughout the Bank's structure and operational levels;
- Establish processes and procedures with a view to developing and promoting staff awareness and training programs;
- Establish standards for ethical, professional and good faith conduct when dealing with issues of this nature, as well as with the adoption of the principle "Know Your Employee".

The responsibilities for the observance and compliance with this Policy are incumbent upon all members of staff, who count on the commitment of the Bank's Board of Directors. Specifically, these responsibilities are described as follows:

- **The Bank's Board of Directors**
To establish institutional guidelines in order to ensure compliance with Laws and Regulations, making this Policy effective, designating managers and assigning their responsibilities;
- **Senior Management**
The General Director is the person responsible for the compliance with the Anti-Money Laundering – Anti-Terrorist Financing Policy in the Bank, as well as for maintaining himself/herself trained, jointly with the staff, in the training programs provided by the Bank. Ensuring that all officers and employees must comply with the rules conducting the opening of accounts and the sale of products and services, obtaining, documenting and maintaining customer data updates, knowing the relevant activities, the source(s) of income, origin and allocation of funds, the economic and financial profile and the expected nature of transactions of deposits, savings or investment accounts;
- **Chief Compliance Officer**
He is responsible for the corporate policies, rules and routines applicable to the issue (CSSF Regulation 12/02 and subsequent related circulars to such) including, amongst his duties, the monitoring and recording of possible suspicious transactions and/or situations suspected of involving money laundering or terrorism financing activity; the development and improvement of automated tools for monitoring transactions; the development of staff awareness and training programs, as well as to interact with the authorities. Additionally, he/she must monitor

customer's transactions explaining, when necessary, the respective transactions in the computer systems, promptly reporting suspicious transactions or situations that may involve money laundering or terrorist financing;

The main provisions guiding this Policy are the following:

- The Bank must adopt the necessary precautions to obtain the full identification of its customers, investors, savers and consumers of products and/or services, maintaining full knowledge of the transactions conducted in its premises, acting in a preventive way as to suspicious transactions and/or situations which may be directly or indirectly connected to the crimes related to money laundering or terrorist financing, typified in the CSSF Regulation 12/02 and subsequent related circulars, and thus to protect the reputation of the Bank, shareholders, administrators, employees and clients;
- In addition to paying close attention to transactions, officers and staff must observe carefully those of doubtful source or which are incompatible with the economic-financial capacity of the client, or their connections and relationships with other corporations, individuals or third parties;
- The written explanation recorded by the Account Officers on the unusual transactions indicated in the transaction verification routines must be based on elements which support and substantiate the transaction(s), by means of an effective and thorough data collection and customer file research;
- The contacts and visits to customers with a view to obtaining information and clarifications on their transactions must always be conducted by the Manager's team with commercial skill and focus, taking the opportunity to update customer data;
- The establishment or maintenance of a relationship with a customer must always be guided by the perspective of transparency and honesty of the customers activities, according to the Know-Your-Customer principle, and not only by the commercial interest and/or profitability this customer may provide in its relationship with the Group;
- Certain activities and/or customers, for their business patterns, may represent a higher probability and risk of being involved with money laundering or terrorist financing and therefore must be subject to a special monitoring level and procedure;
- The identification of a simple proposal or of an effective transaction or situation with evidence of money laundering or terrorist financing, must be immediately reported to the Chief Compliance Officer which, after the pertinent analysis, will determine if the transaction requires reporting to the authorities;
- The Officers, Managers and staff must keep confidentiality on the reports made and, under no circumstances, may disclose or reveal the occurrence to customers or the people involved.

Officers, Managers and staff are expected to comply fully with this Policy and to be diligent when dealing with occurrences of money laundering or terrorist financing.

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