

## Prevention and Detection of Money Laundering and Terrorism Financing Policy

NOVO BANCO, S.A. ("NOVO BANCO") with registered office at Av. da Liberdade, 195, Lisbon, registered with the Commercial Registry Office of Lisbon under the registration and taxpayer number 513.204.016, with the share capital of € €5.900.000.000,00, is a credit institution with its head office in Portugal, registered with the Bank of Portugal ("*Banco de Portugal*") – the entity responsible for the regulation and supervision of credit institutions – and with the Portuguese Securities Market Commission ("*Comissão do Mercado de Valores Mobiliários*") (CMVM) for the carrying out of specific financial intermediation activities.

NOVO BANCO is bound by the laws, regulations and instructions applicable in Portugal to the banking activity which it is authorized to pursue. NOVO BANCO owns a network of agencies, branches, subsidiaries and business units which are bound both by Portuguese laws and the laws of the countries in which they operate.

Given that Portugal is a member-state of the European Union and a founding member of the Financial Action Task Force (FATF/GAFI), NOVO BANCO develops its prevention and detection of money laundering and terrorism financing policy in accordance with the following legislation.

### INTERNATIONAL:

- **Council Directive (EU) 2016/2258 of 06 December 2016**, regarding access to anti-money-laundering information by tax authorities.
- **Directive (EU) 2015/849 of the European Parliament and of the Council of 20 May 2015**, on the prevention of the use of the financial system for the purposes of money laundering or terrorist financing.
- **Regulation (EU) 2015/847 of the European Parliament and of the Council of 20 May 2015**, on information accompanying transfers of funds.
- **Regulation (EU) 2018/1672 of the European Parliament and of the Council of 23 October 2018**, on controls of cash entering or leaving the Union and repealing Regulation (EC) No 1889/2005.
- **Commission Delegated Regulation (EU) 2016/1675 of 14 July 2016, supplementing Directive (EU) 2015/849** of the European Parliament and of the Council by identifying high-risk third countries with strategic deficiencies.
- **The 40 FATF recommendations on money laundering and terrorist financing**, dating from 2012, including the latest revision of the recommendation 15 and addition of new definitions "virtual asset" and "virtual asset service provider" in order to clarify how AML/CFT requirements apply in the context of virtual assets.
- **AML Principles of the Wolfsberg Group.**

## NATIONAL:

- **Law no. 83/2017 of 18 August**, establishes measures to combat money laundering and terrorist financing.
- **Law no. 89/2017 of 21 August**, approves the Legal Regime of the Central Register of Beneficial Ownership, provided for in article 34 of Law no. 83/2017, of August 18.
- **Law no. 97/2017 of 23 August**, regulates the application and enforcement of restrictive measures adopted by the United Nations or the European Union and lays down the rules on penalties applicable to infringements of those measures.
- **Regulation no. 2/2018**, issued by the Bank of Portugal, with regard to the preventive and repressive measures to combat money laundering and terrorist financing ("MLTF") established in Law no. 83/2017, of 18 August, this Notice contains regulations mainly on the duties to prevent and combat MLTF.

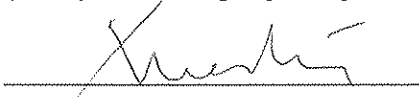
NOVO BANCO believes that effective policies for detecting and preventing money laundering and terrorist financing are greatly enhanced by efficiently managing available resources so that dispersion is reduced to a minimum and the appropriate focus is placed on pursuing an integrated knowledge of Counterparties, Transactions and Processes.

Accordingly, NOVO BANCO develops an effective internal policy on the prevention and detection of money laundering and terrorism financing, strictly complying with the above mentioned legal instruments. Within the scope of such policy, NOVO BANCO has in place a categorization model based on the elements characterizing Clients, which is applied since the opening of the relevant account.

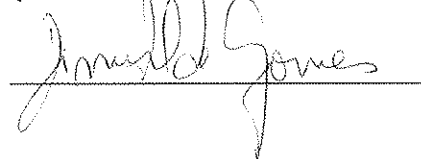
Similarly, Transactions processed in the clients' accounts are monitored automatically pursuant to selected criteria regarding potential risk, allowing a rigorous analysis, both in what concerns behavioural monitoring and scoring against international exception lists. Circumstances deemed suspicious are always communicated to the competent Authorities in strict compliance with the applicable laws.

## NOVO BANCO GROUP

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Executed on this 04 day of January, 2019