








Financial Institution Name:














BANCO BRADESCO EUROPA SA

















Location (Country) :

LUXEMBOURG

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	BANCO BRADESCO EUROPA SA
2	Append a list of foreign branches which are covered by this questionnaire	
3	Full Legal (Registered) Address	25, RUE EDWARD STEICHEN L-2540 LUXEMBOURG
4	Full Primary Business Address (if different from above)	
5	Date of Entity incorporation/ establishment	15/01/1982
6	Select type of ownership and append an ownership chart 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	No 
6 d	Privately Owned	Yes 
6 d1	If Y, provide details of shareholders or ultimate beneficial owners with a holding of 10% or more	OWNED BY BANCO BRADESCO SA, BRAZIL (100%)
7	% of the Entity's total shares composed of bearer shares	0%
8	Does the Entity, or any of its branches, operate under an Offshore Banking License (OBL) ?	No 
8 a	If Y, provide the name of the relevant branch/es which operate under an OBL	
9	Name of primary financial regulator / supervisory authority	CSSF (Commission de Surveillance du Secteur Financier)

10	Provide Legal Entity Identifier (LEI) if available	5493002KG43MZPQEK497	
11	Provide the full legal name of the ultimate parent (if different from the Entity completing the DDQ)	BANCO BRADESCO SA, BRAZIL	
12	Jurisdiction of licensing authority and regulator of ultimate parent	BRAZIL, CENTRAL BANK OF BRAZIL (BANCO CENTRAL DO BRASIL)	
13	Select the business areas applicable to the Entity		
13 a	Retail Banking	No	
13 b	Private Banking / Wealth Management	Yes	
13 c	Commercial Banking	Yes	
13 d	Transactional Banking	Yes	
13 e	Investment Banking	No	
13 f	Financial Markets Trading	Yes	
13 g	Securities Services / Custody	No	
13 h	Broker / Dealer	No	
13 i	Multilateral Development Bank	No	
13 j	Other		
14	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.)	Yes	
14 a	If Y, provide the top five countries where the non-resident customers are located.	BRAZIL	
15	Select the closest value:		
15 a	Number of employees	51-200	
15 b	Total Assets	Greater than \$500 million	
16	Confirm that all responses provided in the above Section ENTITY & OWNERSHIP are representative of all the LE's branches	Yes	
16 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.		
16 b	If appropriate, provide any additional information / context to the answers in this section.		

2. PRODUCTS & SERVICES		
17	Does the Entity offer the following products and services:	
17 a	Correspondent Banking	No 
17 a1	If Y	
17 a2	Does the Entity offer Correspondent Banking services to domestic banks?	
17 a3	Does the Entity allow domestic bank clients to provide downstream relationships?	
17 a4	Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks?	
17 a5	Does the Entity offer correspondent banking services to Foreign Banks?	
17 a6	Does the Entity allow downstream relationships with Foreign Banks?	
17 a7	Does the Entity have processes and procedures in place to identify downstream relationships with Foreign Banks?	
17 a8	Does the Entity offer correspondent banking services to regulated MSBs/MVTS?	
17 a9	Does the Entity allow downstream relationships with MSBs/MVTS?	
17 a10	Does the Entity have processes and procedures in place to identify downstream relationships with MSB /MVTS?	
17 b	Private Banking (domestic & international)	Yes 
17 c	Trade Finance	Yes 
17 d	Payable Through Accounts	No 
17 e	Stored Value Instruments	No 
17 f	Cross Border Bulk Cash Delivery	No 
17 g	Domestic Bulk Cash Delivery	No 
17 h	International Cash Letter	No 
17 i	Remote Deposit Capture	No 
17 j	Virtual /Digital Currencies	No 
17 k	Low Price Securities	No 
17 l	Hold Mail	No 
17 m	Cross Border Remittances	No 
17 n	Service to walk-in customers (non-account holders)	No 
17 o	Sponsoring Private ATMs	No 
17 p	Other high risk products and services identified by the Entity	
18	Confirm that all responses provided in the above Section PRODUCTS & SERVICES are representative of all the LE's branches	Yes 
18 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
18 b	If appropriate, provide any additional information / context to the answers in this section.	










3. AML, CTF & SANCTIONS PROGRAMME			
19	Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:		
19 a	Appointed Officer with sufficient experience/expertise	Yes	▼
19 b	Cash Reporting	Yes	▼
19 c	CDD	Yes	▼
19 d	EDD	Yes	▼
19 e	Beneficial Ownership	Yes	▼
19 f	Independent Testing	Yes	▼
19 g	Periodic Review	Yes	▼
19 h	Policies and Procedures	Yes	▼
19 i	Risk Assessment	Yes	▼
19 j	Sanctions	Yes	▼
19 k	PEP Screening	Yes	▼
19 l	Adverse Information Screening	Yes	▼
19 m	Suspicious Activity Reporting	Yes	▼
19 n	Training and Education	Yes	▼
19 o	Transaction Monitoring	Yes	▼
20	How many full time employees are in the Entity's AML, CTF & Sanctions Compliance Department?	Less than 10	▼
21	Is the Entity's AML, CTF & Sanctions policy approved at least annually by the Board or equivalent Senior Management Committee?	Yes	▼
22	Does the Board or equivalent Senior Management Committee receive regular reporting on the status of the AML, CTF & Sanctions programme?	Annually	▼
23	Does the Entity use third parties to carry out any components of its AML, CTF & Sanctions programme?	No	▼
23 a	If Y, provide further details		
24	Confirm that all responses provided in the above Section AML, CTF & SANCTIONS Programme are representative of all the LE's branches	Yes	▼
24 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.		
24 b	If appropriate, provide any additional information / context to the answers in this section.		

4. ANTI BRIBERY & CORRUPTION			
25	Has the Entity documented policies and procedures consistent with applicable ABC regulations and requirements to [reasonably] prevent, detect and report bribery and corruption?	Yes	<input type="button" value="v"/>
26	Does the Entity have an enterprise wide programme that sets minimum ABC standards?	Yes	<input type="button" value="v"/>
27	Has the Entity appointed a designated officer or officers with sufficient experience/expertise responsible for coordinating the ABC programme?	Yes	<input type="button" value="v"/>
28	Does the Entity have adequate staff with appropriate levels of experience/expertise to implement the ABC programme?	Yes	<input type="button" value="v"/>
29	Is the Entity's ABC programme applicable to:	Both joint ventures and third parties acting on behalf of the Entity	<input type="button" value="v"/>
30	Does the Entity have a global ABC policy that:		
30 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	<input type="button" value="v"/>
30 b	Includes enhanced requirements regarding interaction with public officials?	Yes	<input type="button" value="v"/>
30 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)?	Yes	<input type="button" value="v"/>
31	Does the Entity have controls in place to monitor the effectiveness of their ABC programme?	Yes	<input type="button" value="v"/>
32	Does the Entity's Board or Senior Management Committee receive regular Management Information on ABC matters?	Yes	<input type="button" value="v"/>
33	Does the Entity perform an Enterprise Wide ABC risk assessment?	Yes	<input type="button" value="v"/>
33 a	If Y select the frequency	12 Months	<input type="button" value="v"/>
34	Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment?	Yes	<input type="button" value="v"/>
35	Does the Entity's ABC EWRA cover the inherent risk components detailed below:		
35 a	Potential liability created by intermediaries and other third-party providers as appropriate	Yes	<input type="button" value="v"/>
35 b	Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries	Yes	<input type="button" value="v"/>
35 c	Transactions, products or services, including those that involve state-owned or state-controlled entities or public officials	Yes	<input type="button" value="v"/>
35 d	Corruption risks associated with gifts and hospitality, hiring/internships, charitable donations and political contributions	Yes	<input type="button" value="v"/>
35 e	Changes in business activities that may materially increase the Entity's corruption risk	Yes	<input type="button" value="v"/>
36	Does the Entity's internal audit function or other independent third party cover ABC Policies and Procedures?	Yes	<input type="button" value="v"/>

37	Does the Entity provide mandatory ABC training to:		
37 a	Board and senior Committee Management	Yes	
37 b	1st Line of Defence	Yes	
37 c	2nd Line of Defence	Yes	
37 d	3rd Line of Defence	Yes	
37 e	3rd parties to which specific compliance activities subject to ABC risk have been outsourced	Not Applicable	
37 f	Non-employed workers as appropriate (contractors/consultants)	Yes	
38	Does the Entity provide ABC training that is targeted to specific roles, responsibilities and activities?	Yes	
39	Confirm that all responses provided in the above Section Anti Bribery & Corruption are representative of all the LE's branches	Yes	
39 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.		
39 b	If appropriate, provide any additional information / context to the answers in this section.		

5. AML, CTF & SANCTIONS POLICIES & PROCEDURES			
40	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report:		
40 a	Money laundering	Yes	<input type="button" value="v"/>
40 b	Terrorist financing	Yes	<input type="button" value="v"/>
40 c	Sanctions violations	Yes	<input type="button" value="v"/>
41	Are the Entity's policies and procedures updated at least annually?	Yes	<input type="button" value="v"/>
42	Are the Entity's policies and procedures gapped against/compared to:		
42 a	US Standards	Yes	<input type="button" value="v"/>
42 a1	If Y, does the Entity retain a record of the results?	No	<input type="button" value="v"/>
42 b	EU Standards	Yes	<input type="button" value="v"/>
42 b1	If Y, does the Entity retain a record of the results?	Yes	<input type="button" value="v"/>
43	Does the Entity have policies and procedures that:		
43 a	Prohibit the opening and keeping of anonymous and fictitious named accounts	Yes	<input type="button" value="v"/>
43 b	Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs	Yes	<input type="button" value="v"/>
43 c	Prohibit dealing with other entities that provide banking services to unlicensed banks	Yes	<input type="button" value="v"/>
43 d	Prohibit accounts/relationships with shell banks	Yes	<input type="button" value="v"/>
43 e	Prohibit dealing with another entity that provides services to shell banks	Yes	<input type="button" value="v"/>
43 f	Prohibit opening and keeping of accounts for Section 311 designated entities	Yes	<input type="button" value="v"/>
43 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	<input type="button" value="v"/>
43 h	Assess the risks of relationships with domestic and foreign PEPs, including their family and close associates	Yes	<input type="button" value="v"/>
43 i	Define escalation processes for financial crime risk issues	Yes	<input type="button" value="v"/>
43 j	Define the process, where appropriate, for terminating existing customer relationships due to financial crime risk	Yes	<input type="button" value="v"/>
43 k	Specify how potentially suspicious activity identified by employees is to be escalated and investigated	Yes	<input type="button" value="v"/>
43 l	Outline the processes regarding screening for sanctions, PEPs and negative media	Yes	<input type="button" value="v"/>
43 m	Outline the processes for the maintenance of internal "watchlists"	Yes	<input type="button" value="v"/>
44	Has the Entity defined a risk tolerance statement or similar document which defines a risk boundary around their business?	Yes	<input type="button" value="v"/>
45	Does the Entity have a record retention procedures that comply with applicable laws?	Yes	<input type="button" value="v"/>
45 a	If Y, what is the retention period?	5 years or more	<input type="button" value="v"/>
46	Confirm that all responses provided in the above Section POLICIES & PROCEDURES are representative of all the LE's branches	Yes	<input type="button" value="v"/>
46 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.		
46 b	If appropriate, provide any additional information / context to the answers in this section.		







6. AML, CTF & SANCTIONS RISK ASSESSMENT			
47	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:		
47 a	Client	Yes	<input type="button" value="v"/>
47 b	Product	Yes	<input type="button" value="v"/>
47 c	Channel	Yes	<input type="button" value="v"/>
47 d	Geography	Yes	<input type="button" value="v"/>
48	Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below:		
48 a	Transaction Monitoring	Yes	<input type="button" value="v"/>
48 b	Customer Due Diligence	Yes	<input type="button" value="v"/>
48 c	PEP Identification	Yes	<input type="button" value="v"/>
48 d	Transaction Screening	Yes	<input type="button" value="v"/>
48 e	Name Screening against Adverse Media & Negative News	Yes	<input type="button" value="v"/>
48 f	Training and Education	Yes	<input type="button" value="v"/>
48 g	Governance	Yes	<input type="button" value="v"/>
48 h	Management Information	Yes	<input type="button" value="v"/>
49	Has the Entity's AML & CTF EWRA been completed in the last 12 months?	Yes	<input type="button" value="v"/>
49 a	If N, provide the date when the last AML & CTF EWRA was completed.		
50	Does the Entity's Sanctions EWRA cover the inherent risk components detailed below:		
50 a	Client	Yes	<input type="button" value="v"/>
50 b	Product	Yes	<input type="button" value="v"/>
50 c	Channel	Yes	<input type="button" value="v"/>
50 d	Geography	Yes	<input type="button" value="v"/>








51	Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below:		
51 a	Customer Due Diligence	Yes	
51 b	Transaction Screening	Yes	
51 c	Name Screening	Yes	
51 d	List Management	Yes	
51 e	Training and Education	Yes	
51 f	Governance	Yes	
51 g	Management Information	Yes	
52	Has the Entity's Sanctions EWRA been completed in the last 12 months?	Yes	
52 a	If N, provide the date when the last Sanctions EWRA was completed.		
53	Confirm that all responses provided in the above Section AML, CTF & SANCTIONS RISK ASSESSMENT are representative of all the LE's branches	Yes	
53 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.		
53 b	If appropriate, provide any additional information / context to the answers in this section.		

7. KYC, CDD and EDD			
54	Does the Entity verify the identity of the customer?	Yes	<input type="button" value="v"/>
55	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	<input type="button" value="v"/>
56	Which of the following does the Entity gather and retain when conducting CDD? Select all that apply:		
56 a	Ownership structure	Yes	<input type="button" value="v"/>
56 b	Customer identification	Yes	<input type="button" value="v"/>
56 c	Expected activity	Yes	<input type="button" value="v"/>
56 d	Nature of business/employment	Yes	<input type="button" value="v"/>
56 e	Product usage	Yes	<input type="button" value="v"/>
56 f	Purpose and nature of relationship	Yes	<input type="button" value="v"/>
56 g	Source of funds	Yes	<input type="button" value="v"/>
56 h	Source of wealth	Yes	<input type="button" value="v"/>
57	Are each of the following identified:		
57 a	Ultimate beneficial ownership	Yes	<input type="button" value="v"/>
57 a1	Are ultimate beneficial owners verified?	Yes	<input type="button" value="v"/>
57 b	Authorised signatories (where applicable)	Yes	<input type="button" value="v"/>
57 c	Key controllers	Yes	<input type="button" value="v"/>
57 d	Other relevant parties	PoA's	
58	What is the Entity's minimum (lowest) threshold applied to beneficial ownership identification ?	10%	<input type="button" value="v"/>
59	Does the due diligence process result in customers receiving a risk classification?	Yes	<input type="button" value="v"/>



60	If Y, what factors/criteria are used to determine the customer's risk classification? Select all that apply:		
60 a	Product Usage	Yes	<input type="checkbox"/>
60 b	Geography	Yes	<input type="checkbox"/>
60 c	Business Type/Industry	Yes	<input type="checkbox"/>
60 d	Legal Entity type	Yes	<input type="checkbox"/>
60 e	Adverse Information	Yes	<input type="checkbox"/>
60 f	Other (specify)	Tax Compliance, Transaction History, Length of Relationship, Asset under Management	
61	Does the Entity have a risk based approach to screening customers for adverse media/negative news?	Yes	<input type="checkbox"/>
62	If Y, is this at:		
62 a	Onboarding	Yes	<input type="checkbox"/>
62 b	KYC renewal	Yes	<input type="checkbox"/>
62 c	Trigger event	Yes	<input type="checkbox"/>
63	What is the method used by the Entity to screen for adverse media / negative news?	Combination of automated and manual	<input type="checkbox"/>
64	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	<input type="checkbox"/>
65	If Y, is this at:		
65 a	Onboarding	Yes	<input type="checkbox"/>
65 b	KYC renewal	Yes	<input type="checkbox"/>
65 c	Trigger event	Yes	<input type="checkbox"/>
66	What is the method used by the Entity to screen PEPs?	Automated	<input type="checkbox"/>
67	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	<input type="checkbox"/>
68	Does the Entity have a process to review and update customer information based on:		
68 a	KYC renewal	Yes	<input type="checkbox"/>
68 b	Trigger event	Yes	<input type="checkbox"/>
69	Does the Entity maintain and report metrics on current and past periodic or trigger event due diligence reviews?	Yes	<input type="checkbox"/>

70	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?		
70 a	Non-account customers	Prohibited	<input type="button" value="v"/>
70 b	Non-resident customers	EDD on a risk based approach	<input type="button" value="v"/>
70 c	Shell banks	Prohibited	<input type="button" value="v"/>
70 d	MVTS/ MSB customers	Prohibited	<input type="button" value="v"/>
70 e	PEPs	EDD on a risk based approach	<input type="button" value="v"/>
70 f	PEP Related	EDD on a risk based approach	<input type="button" value="v"/>
70 g	PEP Close Associate	EDD on a risk based approach	<input type="button" value="v"/>
70 h	Correspondent Banks	Do not have this category of customer or industry	<input type="button" value="v"/>
70 h1	If EDD or EDD & restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2014?	Yes	<input type="button" value="v"/>
70 i	Arms, defense, military	Prohibited	<input type="button" value="v"/>
70 j	Atomic power	Prohibited	<input type="button" value="v"/>
70 k	Extractive industries	EDD on a risk based approach	<input type="button" value="v"/>
70 l	Precious metals and stones	EDD on a risk based approach	<input type="button" value="v"/>
70 m	Unregulated charities	EDD on a risk based approach	<input type="button" value="v"/>
70 n	Regulated charities	EDD on a risk based approach	<input type="button" value="v"/>
70 o	Red light business / Adult entertainment	Prohibited	<input type="button" value="v"/>
70 p	Non-Government Organisations	EDD on a risk based approach	<input type="button" value="v"/>
70 q	Virtual currencies	Prohibited	<input type="button" value="v"/>
70 r	Marijuana	Prohibited	<input type="button" value="v"/>
70 s	Embassies/Consulates	EDD on a risk based approach	<input type="button" value="v"/>
70 t	Gambling	Prohibited	<input type="button" value="v"/>
70 u	Payment Service Provider	EDD on a risk based approach	<input type="button" value="v"/>
70 v	Other (specify)		
71	If restricted, provide details of the restriction		
72	Does the Entity perform an additional control or quality review on clients subject to EDD?	Yes	<input type="button" value="v"/>
73	Confirm that all responses provided in the above Section KYC, CDD and EDD are representative of all the LE's branches	Yes	<input type="button" value="v"/>
73 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to		
73 b	If appropriate, provide any additional information / context to the answers in this section.		




8. MONITORING & REPORTING			
74	Does the Entity have risk based policies, procedures and monitoring processes for the identification and reporting of suspicious activity?	Yes	
75	What is the method used by the Entity to monitor transactions for suspicious activities?	Combination of automated and manual	
76	If manual or combination selected, specify what type of transactions are monitored manually	All transactions are automatically monitored within the system. Due to the very low volume of transactions (+/- 10 per day), all transactions are also monitored manually.	
77	Does the Entity have regulatory requirements to report suspicious transactions?	Yes	
77 a	If Y, does the Entity have policies, procedures and processes to comply with suspicious transaction reporting requirements?	Yes	
78	Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity?	Yes	
79	Confirm that all responses provided in the above Section MONITORING & REPORTING are representative of all the LE's branches	Yes	
79 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to		
79 b	If appropriate, provide any additional information / context to the answers in this section.		

9. PAYMENT TRANSPARENCY		
80	Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards?	Yes 
81	Does the Entity have policies, procedures and processes to [reasonably] comply with and have controls in place to ensure compliance with:	
81 a	FATF Recommendation 16	Yes 
81 b	Local Regulations	Yes 
81 b1	Specify the regulation	Regulation (EU) 2015/847 of the European Parliament and the Council of 20 of May 2015 on the information accompanying transfers of funds. CSSF Circular 17/660 CSSF Circular 18/680
81 c	If N, explain	
82	Does the Entity have processes in place to respond to Request For Information (RFIs) from other entities in a timely manner?	Yes 
83	Does the Entity have controls to support the inclusion of required and accurate originator information in international payment messages?	Yes 
84	Does the Entity have controls to support the inclusion of required beneficiary information in international payment messages?	Yes 
85	Confirm that all responses provided in the above Section PAYMENT TRANSPARENCY are representative of all the LE's branches	Yes 
85 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
85 b	If appropriate, provide any additional information / context to the answers in this section.	

10. SANCTIONS			
86	Does the Entity have a Sanctions Policy approved by management regarding compliance with sanctions law applicable to the Entity, including with respect its business conducted with, or through accounts held at foreign financial institutions?	Yes	▼
87	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	▼
88	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	▼
89	Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists?	Yes	▼
90	What is the method used by the Entity?	Automated	▼
91	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	▼
92	What is the method used by the Entity?	Automated	▼
93	Select the Sanctions Lists used by the Entity in its sanctions screening processes:		
93 a	Consolidated United Nations Security Council Sanctions List (UN)	Used for screening customers and beneficial owners and for filtering transactional data	▼
93 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	▼
93 c	Office of Financial Sanctions Implementation HMT (OFSI)	Used for screening customers and beneficial owners and for filtering transactional data	▼
93 d	European Union Consolidated List (EU)	Used for screening customers and beneficial owners and for filtering transactional data	▼
93 e	Lists maintained by other G7 member countries	Used for screening customers and beneficial owners and for filtering transactional data	▼
93 f	Other (specify)		
94	Question removed		
95	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:		
95 a	Customer Data	Same day to 2 business days	▼
95 b	Transactions	Same day to 2 business days	▼

96	Does the Entity have a physical presence, e.g., branches, subsidiaries, or representative offices located in countries/regions against which UN, OFAC, OFSI, EU and G7 member countries have enacted comprehensive jurisdiction-based Sanctions?	No	
97	Confirm that all responses provided in the above Section SANCTIONS are representative of all the LE's branches	Yes	
97 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.		
97 b	If appropriate, provide any additional information / context to the answers in this section.		

11. TRAINING & EDUCATION		
98	Does the Entity provide mandatory training, which includes :	
98 a	Identification and reporting of transactions to government authorities	Yes
98 b	Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered	Yes
98 c	Internal policies for controlling money laundering, terrorist financing and sanctions violations	Yes
98 d	New issues that occur in the market, e.g., significant regulatory actions or new regulations	Yes
98 e	Conduct and Culture	Yes
99	Is the above mandatory training provided to :	
99 a	Board and Senior Committee Management	Yes
99 b	1st Line of Defence	Yes
99 c	2nd Line of Defence	Yes
99 d	3rd Line of Defence	Yes
99 e	3rd parties to which specific FCC activities have been outsourced	Not Applicable
99 f	Non-employed workers (contractors/consultants)	Not Applicable
100	Does the Entity provide AML, CTF & Sanctions training that is targeted to specific roles, responsibilities and high risk products, services and activities?	Yes
101	Does the Entity provide customised training for AML, CTF and Sanctions staff?	Yes
102	Confirm that all responses provided in the above Section TRAINING & EDUCATION are representative of all the LE's branches	Yes
102 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
102 b	If appropriate, provide any additional information / context to the answers in this section.	

12. QUALITY ASSURANCE /COMPLIANCE TESTING			
103	Are the Entity's KYC processes and documents subject to quality assurance testing?	Yes	
104	Does the Entity have a program wide risk based Compliance Testing process (separate to the independent Audit function)?	Yes	
105	Confirm that all responses provided in the above Section QUALITY ASSURANCE / COMPLIANCE TESTING are representative of all the LE's branches	Yes	
105 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.		
105 b	If appropriate, provide any additional information / context to the answers in this section.		

13. AUDIT		
106	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 and Sanctions policies and practices on a regular basis?	Yes
107	How often is the Entity audited on its AML, CTF & Sanctions programme by the following:	
107 a	Internal Audit Department	Yearly
107 b	External Third Party	Yearly
108	Does the internal audit function or other independent third party cover the following areas:	
108 a	AML, CTF & Sanctions policy and procedures	Yes
108 b	KYC / CDD / EDD and underlying methodologies	Yes
108 c	Transaction Monitoring	Yes
108 d	Transaction Screening including for sanctions	Yes
108 e	Name Screening & List Management	Yes
108 f	Training & Education	Yes
108 g	Technology	Yes
108 h	Governance	Yes
108 i	Reporting/Metrics & Management Information	Yes
108 j	Suspicious Activity Filing	Yes
108 k	Enterprise Wide Risk Assessment	Yes
108 l	Other (specify)	
109	Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness?	Yes
110	Confirm that all responses provided in the above section, AUDIT are representative of all the LE's branches	Yes
110 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
110 b	If appropriate, provide any additional information / context to the answers in this section.	

Declaration Statement

Wolfsberg Group Correspondent Banking Due Diligence Questionnaire 2020 (CBDDQ V1.3)

Declaration Statement (To be signed by Global Head of Correspondent Banking or equivalent position holder AND Group Money Laundering Prevention Officer, Global Head of Anti-Money Laundering, Chief Compliance Officer, Global Head of Financial Crimes Compliance OR equivalent)

BANCO BRADESCO EUROPA SA

(Financial Institution name) is fully committed to the fight against financial crime and makes 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.

The Financial Institution further certifies it complies with / is working to comply with the Wolfsberg Correspondent Banking Principles and the Wolfsberg Trade Finance Principles. The information provided in this Wolfsberg CBDDQ will be kept current and will be updated no less frequently than on an annual basis.

The Financial Institution commits to file accurate supplemental information on a timely basis.


HUMBERTO FARIA LEMBI DE CARVALHO

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.

GAVAN GUILFOYLE

I, (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.

29/06/2022


Humberto Carvalho
General Manager

(Signature & Date)

29/06/2022


Gavan Guilfoyle - Chief Compliance Officer

(Signature & Date)