the Wolfsberg Group

Financial Institution Name: Location (Country) : BANCO DO ESTADO DO RIO GRANDE DO SUL S.A Brazil

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 do Estado do Rio Grande do Sul S.A.
2	Append a list of foreign branches which are covered by this questionnaire	
3	Full Legal (Registered) Address	Rua Capitão Montanha, 177. Porto Alegre - RS CEP: 90010-040. Brazil.
4	Full Primary Business Address (if different from above)	Rua Caldas Júnior, 108. Porto Alegre - RS. CEP: 90018-900. Brazil.
5	Date of Entity incorporation/establishment	September 12, 1928.
6	Select type of ownership and append an ownership chart if available	
6 a	Publicly Traded (25% of shares publicly traded)	Yes
6 a1	If Y, indicate the exchange traded on and ticker symbol	The company's shares are traded on B3 S.A Brasil, Bolsa, Balcão. under the ticker symbols BRSR3, BRSR5 and BRSR6.
6 b	Member Owned/Mutual	No
6 c	Government or State Owned by 25% or more	Yes
6 d	Privately Owned	No
6 d1	If Y, provide details of shareholders or ultimate beneficial owners with a holding of 10% or more	N/A
7	% of the Entity's total shares composed of bearer shares	N/A
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	Does the Bank have a Virtual Bank License or provide services only through online channels?	No
10	Name of primary financial regulator/supervisory authority	Central Bank of Brazil.
11	Provide Legal Entity Identifier (LEI) if available	254900W2BN097WLYIM20
12	Provide the full legal name of the ultimate parent (if different from the Entity completing the DDQ)	N/A

13	Jurisdiction of licensing authority and regulator of ultimate parent	N/A
4.4	Onland the business are provided by the Entity	
14	Select the business areas applicable to the Entity	
14 a	Retail Banking	Yes
14 b	Private Banking	No
14 c	Commercial Banking	Yes
14 d	Transactional Banking	Yes
14 e	Investment Banking	Yes
14 f	Financial Markets Trading	Yes
14 g	Securities Services/Custody	Yes
14 h	Broker/Dealer	Yes
14 i	Multilateral Development Bank	No
14 j	Wealth Management	No
14 J	Other (please explain)	NO
14 K	Other (please explain)	
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.	
16	Select the closest value:	
16 a	Number of employees	5001-10000
16 b	Total Assets	Greater than \$500 million
17	Confirm that all responses provided in the above	
	Section 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. PRODU	ICTS & SERVICES	
19	Does the Entity offer the following products and services:	
19 a	Correspondent Banking	No
19 a 19 a1	If Y	
19 a1a	Does the Entity offer Correspondent Banking	Please select
19 a1b	services to domestic banks? Does the Entity allow domestic bank clients to	Please select
19 a1c	provide downstream relationships? Does the Entity have processes and procedures	
	in place to identify downstream relationships with domestic banks?	Please select
19 a1d	Does the Entity offer Correspondent Banking services to foreign banks?	Please select
19 a1e	Does the Entity allow downstream relationships with foreign banks?	Please select
19 a1f	Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks?	Please select
19 a1g	Does the Entity offer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTSs)?	Please select
19 a1h	Does the Entity allow downstream relationships with MSBs, MVTSs, or Payment Service Provider (PSPs)?	
19 a1h1	MSBs	Please select
19 a1h2	MVTSs	Please select
19 a1h3	PSPs	Please select
		1

19 a1i	Does the Entity have processes and procedures	
1	in place to identify downstream relationships with	Please select
	MSBs /MVTSs/PSPs?	Please select
	IVIODS /IVIV IOS/POPS ?	
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
19 f	International Cash Letter	
-		No
19 g	Low Price Securities	Yes
19 h	Payable Through Accounts	No
-		
19 i	Payment services to non-bank entities who may	
	then offer third party payment services to their	No
	customers?	
19 i1	If Y , please select all that apply below?	
19 i2	Third Party Payment Service Providers	Please select
19 i3	Virtual Asset Service Providers (VASPs)	Please select
19 i4	eCommerce Platforms	Please select
19 i5	Other - Please explain	
1		
40 :	Drivete Danking	
19 j	Private Banking	No
19 k	Remote Deposit Capture (RDC)	Yes
191	Sponsoring Private ATMs	Yes
19 m	Stored Value Instruments	No
19 n	Trade Finance	Yes
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	Check cashing service	No
19 p1a	If yes, state the applicable level of due diligence	Please select
19 p2	Wire transfers	No
19 p2a	If yes, state the applicable level of due diligence	Please select
	Foreign currency conversion	No
19 p3		
19 p3 19 p3a	If yes, state the applicable level of due diligence	Please select
19 p3a	If yes, state the applicable level of due diligence	Please select
19 p3a 19 p4	If yes, state the applicable level of due diligence Sale of Monetary Instruments	Please select No
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	Please select
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19 p3a 19 p4 19 p4 19 p4 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	Please select No Please select Yes Yes Yes Yes Yes Yes Yes
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19 p3a 19 p4 19 p4 19 p5 19 q 20 20 a 21 3. AML, CT 22 22 a 22 c 22 d 22 e 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 EDD Independent Testing Periodic Review	Please select No Please select Ves Yes Yes Yes Yes Yes Yes Yes Yes Yes Y
19 p3a 19 p4 19 p4 19 p4a 19 p5 19 q 20 20 a 21 3. AML, C1 22 a 22 b 22 c 22 d 22 e 22 g 22 f 22 g 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	Please select No Please select Yes
19 p3a 19 p4 19 p4 19 p4 19 p5 19 q 20 20 a 20 a 21 22 a 22 b 22 c 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 Cash Reporting CDD EDD Independent Testing Periodic Review	Please select No Please select Ves Yes Yes Yes Yes Yes Yes Yes Yes Yes Y
19 p3a 19 p4 19 p4a 19 p5 19 q 20 20 a 21 3. AML, C1 22 a 22 b 22 c 22 b 22 c 22 d 22 e 22 g 22 g 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	Please select No Please select Yes Yes Yes
19 p3a 19 p4 19 p4 19 p4a 19 p5 20 20 a 20 a 21 3. AML, CT 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 EDD Independent Testing Periodic Review Policies and Procedures PEP Screening	Please select No Please select Yes Yes<

22 m	Suspicious Activity Reporting	Yes
22 m 22 n	Training and Education	Yes
22 0	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?	No
26 a	If Y, provide further details	
27	Does the entity have a whistleblower policy?	Yes
28	Confirm that all responses provided in the above Section 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. ANTI	BRIBERY & 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:	Both joint ventures and third parties acting on behalf of the Entity
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 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
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:	Yes
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 40 e Changes in business activities that may materially increase the Entity's corruption risk Yes 41 Does the Entity is internal audit function or other independent third party cover ABC Policies and Procedures? Yes 42 Does the Entity provide mandatory ABC training to: 42 a 42 a Board and senior Committee Management 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 Yes 42 d 3rd Line of Defence Yes 42 e Third parties to which specific compliance activities subject to ABC risk have been outsourced Yes	
that involve state-owned or state-controlled entities or public officialsYes40 dCorruption risks associated with gifts and hospitality, hiring/internships, charitable donations and political contributionsYes40 eChanges in business activities that may materially increase the Entity's corruption riskYes41Does the Entity's corruption or other independent third party cover ABC Policies and Procedures?Yes42Does the Entity rovide mandatory ABC training to:Yes42Board and senior Committee Management 42 bYes42 c2nd Line of Defence 42 dYes42 d3rd Line of Defence subject to ABC risk have been outsourcedYes42 eThird parties to which specific compliance activities subject to ABC risk have been outsourcedYes	
hospitality, hiring/internships, charitable donations and political contributionsYes40 eChanges in business activities that may materially increase the Entity's corruption riskYes41Does the Entity's internal audit function or other independent third party cover ABC Policies and Procedures?Yes42Does the Entity provide mandatory ABC training to:Yes42Board and senior Committee ManagementYes42 b1st Line of DefenceYes42 c2nd Line of DefenceYes42 d3rd Line of DefenceYes42 eThird parties to which specific compliance activities subject to ABC risk have been outsourcedYes	
increase the Entity's corruption riskYes41Does the Entity's internal audit function or other independent third party cover ABC Policies and Procedures?Yes42Does the Entity provide mandatory ABC training to:Yes42Board and senior Committee ManagementYes42 b1st Line of DefenceYes42 c2nd Line of DefenceYes42 d3rd Line of DefenceYes42 eThird parties to which specific compliance activities subject to ABC risk have been outsourcedYes	
independent third party cover ABC Policies and Procedures?Yes42Does the Entity provide mandatory ABC training to:42 aBoard and senior Committee Management42 b1st Line of Defence42 c2nd Line of Defence42 d3rd Line of Defence42 eThird parties to which specific compliance activities subject to ABC risk have been outsourcedYes	
42 a Board and serior 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 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 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 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 Yes	
42 d 3rd Line of Defence Yes 42 e Third parties to which specific compliance activities subject to ABC risk have been outsourced Yes	
42 e Third parties to which specific compliance activities subject to ABC risk have been outsourced Yes	
subject to ABC risk have been outsourced Yes	
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? Please select	
48 b EU Standards No	
19 b1 If V does the Entity rotain a record of the regulte?	
48 b1 If Y, does the Entity retain a record of the results? Please select	
49 Does the Entity have policies and procedures that: 49 a Prohibit the opening and keeping of anonymous	
49 Does the Entity have policies and procedures that: 49 a Prohibit the opening and keeping of anonymous and fictitious named accounts 49 b Prohibit the opening and keeping of accounts for	
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 Yes	
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 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 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 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 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 nother entity that provides services to shell banks Yes 49 f Prohibit dealing of accounts for Section 311 designated entities Yes	
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 deeping and keeping of accounts for yes Yes	

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
491	Define the process and controls to identify and handle customers that were previously exited for financial crime reasons if they seek to re-establish a relationship	Yes
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 comply with applicable laws?	Yes
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 to the answers in this section.	
6 AML CTE		
6. AML, CTF 54	& SANCTIONS RISK ASSESSMENT Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:	
54	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:	Vas
54 54 a	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client	Yes
54 54 a 54 b	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product	Yes
54 54 a	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client	Yes Yes
54 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:	Yes
54 a 54 b 54 c 54 d 55 55 a	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 Yes
54 a 54 b 54 c 54 d 55 c 55 a 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
54 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c	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 PEP Identification	Yes Yes Yes Yes Yes Yes
54 a 54 b 54 c 54 d 55 c 55 a 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 PEP Identification Transaction Screening Name Screening against Adverse Media/Negative	Yes Yes Yes Yes
54 54 a 54 b 54 c 54 d 55 a 55 b 55 c 55 d 55 e	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 PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News	Yes
54 54 a 54 b 54 c 54 d 55 a 55 b 55 c	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 PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education	Yes
54 54 a 54 b 54 c 54 d 55 a 55 b 55 c 55 d 55 e	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 PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance	Yes
54 54 a 54 b 54 c 55 a 55 b 55 c 55 f 55 g 56	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 PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months?	Yes
54 54 a 54 b 54 c 55 a 55 a 55 b 55 c 55 d 55 c 55 d 55 c 55 f 55 g 55 h	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 PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed	Yes
54 54 a 54 b 54 c 54 d 55 a 55 b 55 c 55 d 55 c 55 d 55 c 55 d 55 f 55 f 55 h 56 56 a 57	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 PEP Identification Trainsaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below:	Yes
54 54 a 54 b 54 c 54 d 55 a 55 b 55 c 55 d 55 c 55 d 55 c 55 d 55 f 55 f 55 h 56 56 57 57 a	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 PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client	Yes
54 54 a 54 b 54 c 54 d 55 a 55 b 55 c 55 d 55 c 55 d 55 c 55 d 55 f 55 g 56 56 57 57 a 57 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 PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product	Yes Y
54 54 a 54 b 54 c 54 d 55 a 55 b 55 c 55 d 55 c 55 d 55 c 55 d 55 f 55 g 56 56 57 a 57 b 57 c	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 PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel	Yes Y
54 54 a 54 b 54 c 54 d 55 a 55 b 55 c 55 d 55 c 55 d 55 c 55 d 55 f 55 g 55 h 56 57 57 a 57 c 57 d	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 PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography	Yes Y
54 54 a 54 b 54 c 54 d 55 a 55 b 55 c 55 d 55 c 55 d 55 c 55 d 55 d 55 f 56 a 57 57 a 57 c 57 d 58	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 PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below:	Yes
54 54 a 54 b 54 c 55 a 55 a 55 b 55 c 55 d 55 f 55 d 55 f 55 f 55 f 56 56 57 57 a 57 c 57 d 58 a	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 PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below:	Yes
54 54 a 54 b 54 c 54 d 55 a 55 b 55 c 55 d 55 c 55 d 55 c 55 d 55 f 55 g 55 h 56 56 57 a 57 c 57 d 58 a 58 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 PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: Cuistomer Due Diligence Governance	Yes Y
54 54 a 54 c 54 c 55 a 55 a 55 b 55 c 55 d 55 c 55 d 55 c 55 d 55 f 55 g 55 h 56 56 57 57 a 57 c 57 d 58 a	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 PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below:	Yes

50 -	Nama Caraanian	
58 e	Name Screening	Yes
58 f	Transaction Screening	Yes
58 g	Training and Education	Yes
59	Has the Entity's Sanctions EWRA been completed in the last 12 months?	Yes
59 a	If N, provide the date when the last Sanctions EWRA was completed.	
60	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
60 a 61	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.	
7. KYC, C	DD and EDD	
62	Does the Entity verify the identity of the customer?	Yes
63	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
64	Which of the following does the Entity gather and retain when conducting CDD? Select all that apply:	
64 a	Customer identification	Yes
64 b	Expected activity	Yes
64 c	Nature of business/employment	Yes
64 d	Ownership structure	Yes
64 e	Product usage	Yes
64 f	Purpose and nature of relationship	Yes
64 g	Source of funds	Yes
64 h	Source of wealth	Yes
65	Are each of the following identified:	
65 a	Ultimate beneficial ownership	Yes
65 a1	Are ultimate beneficial owners verified?	Yes
65 b	Authorised signatories (where applicable)	Yes
65 c	Key controllers	Yes
65 d	Other relevant parties	Yes
66	What is the Entity's minimum (lowest) threshold applied to beneficial ownership identification?	10%
67	Does the due diligence process result in customers receiving a risk classification?	Yes
67 a	If Y, what factors/criteria are used to determine the 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 67 a6	Adverse Information Other (specify)	Yes
07 20	Other (specify)	
68	For high risk non-individual customers, is a site visit a part of your KYC process?	Yes
68 a	If Y, is this at:	
68 a1	Onboarding	Yes
68 a2	KYC renewal	Yes
68 a3	Trigger event	Yes
68 a4	Other	Yes
68 a4a	If yes, please specify "Other"	A site visit is made during our KYC process at onboarding. After the site visit a visitor report is stored for analysis and subsequent consultation. After onboarding, all individuals and entities are classified according to some evaluation criteria and the company location and its activity is some of the criteria, mitigating the risk. In addition, these clients' financial transactions are monitored by the Fntitv's AMI_system.
69	Does the Entity have a risk based approach to screening customers for Adverse Media/Negative News?	Yes
69 a	If Y, is this at:	
69 a1	Onboarding	No
69 a2	KYC renewal	No

70 What is the method used by the Entity to screen for cultures and contexids particle to determine the particle and contexids particle to determine where and contexids particle to determine whether the particle and contexids and the particle and the partis and the particle and the particle and the particle a	69 a3	Trigger event	Yes
Adverse MediaMagebro Mars Controling of aduoted aduoted ad definition 71 Does Enviry Mars and subset Aground how strates Sec 71 If all aduoted aduo			
Customer and connected paries to determine whether they are PERs, or controlled pPERs? Number of the person of the p		Adverse Media/Negative News?	Combination of automated and manual
71 a1 Orboxaching Yes 71 a2 Vick removal Yes 71 a3 Trigger sent Yes 73 Wita Is method use by the Entity to scene PEPs Attended 73 Wita Is the method use by the Entity to scene PEPs Attended 74 Thysica Is the Entity these policies, procedures and processes to review and excellate policini marker frame scene processes to review and processes to the excent processes to the excent processes to review and processes to the excent processes to the excent processes to review and processes to the fort processes to the fort processes to the excent processes to review and processes to the fort	71	customers and connected parties to determine whether	Yes
71 43 Trigger vent Yes 72 Weat is the mathod used by the Entry to screen FEPS? Altornated 73 Does the Entry two globics, procedures and processes to review and escalate potential mathos from screening customers and connect dopaties to determine they they are FEPs, or controlled by FEPs? Yes 74 B XPC remeet all effecting they globic they are FEPs, or controlled by FEPs? No 74 B XPC remeet all effecting they they are FEPs, or controlled by FEPs? No 74 FEPs, activation of the they are FEPs? No 74 FEPs, activation of the they are FEPs? No 74 FEPs, activation of the they are feel and the they activation of the they are FEPs? 74 FEPs activation of the they are feel and the they activation of they activation of the they activation of they acti	71 a	If Y, is this at:	
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76 t Shell banks Prohibited 76 u Travel and Tour Companies EDD on risk-based approach 76 v Unregulated charities Prohibited 76 w Used Car Dealers Prohibited 76 x Virtual Asset Service Providers Prohibited 76 y Other (specify) Prohibited 77 If restricted, provide details of the restriction Regarding item 76h: the Bank only operates with exchange office, that have legal authorization to operate and are in compliance with our AML/CFT guidelines and procedures. 78 Does EDD require senior business management and/ Yor		· · ·	
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76 v Unregulated charities Prohibited 76 w Used Car Dealers Prohibited 76 x Virtual Asset Service Providers Prohibited 76 y Other (specify) Prohibited 77 If restricted, provide details of the restriction Regarding item 76h: the Bank only operates with exchange office, that have legal authorization to operate and are in compliance with our AML/CFT guidelines and procedures. 78 Does EDD require senior business management and/ Yor.			
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76 y Other (specify) 77 If restricted, provide details of the restriction Regarding item 76h: the Bank only operates with exchange office, that have legal authorization to operate and are in compliance with our AML/CFT guidelines and procedures. 78 Does EDD require senior business management and/	-		
 Regarding item /bit: the Bank only operates with exchange office, that have legal authorization to operate and are in compliance with our AML/CFT guidelines and procedures. 78 Does EDD require senior business management and/ 			Prohibited
Voc	77	If restricted, provide details of the restriction	
Voc	78	Does EDD require senior business management and/	
	-	or compliance approval?	Yes

78 a	If Y indicate who provides the approval:	Senior business management
79	Does the Entity have specific procedures for	
15	onboarding entities that handle client money such as lawyers, accountants, consultants, real estate agents?	No
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 are representative of all the LE's branches	Yes
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.	Regarding item 66: for individuals 10% and for companies 20%: Regarding item 78a: Senior business management of the branches.
8. MONITO	DRING & 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?	Automated
84 a	If manual or combination selected, specify what type of transactions are monitored manually	
84 b	If automated or combination selected, are internal system or vendor-sourced tools used?	Vendor-sourced tools
84 b1	If 'Vendor-sourced tool' or 'Both' selected, what is the name of the vendor/tool?	Our vendor's name is Softon Sistemas Inteligentes.
84 b2	When was the tool last updated?	< 1 year
84 b3	When was the automated Transaction Monitoring application last calibrated?	< 1 year
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. PAYME	NT TRANSPARENCY	
92	1	
~	Does the Entity adhere to the Wolfsberg Group Payment 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	FATE Recommendation 16	
		Yes
93 b	Local Regulations	Yes
93 b1	If Y, specify the regulation	Law 9,613/98; Law 13,260/16; Law 13,810/19; CMN Resolution 3,568/08; CMN Resolution 4,557/17; CMN Resolution 4,935/21; CMN Resolution 4,968/21; Law 14,286/22; BCB Resolution 277/22; BCB Resolution 44/20; BCB Circular Letter 3,978/20; BCB Circular Letter 4,001/21; CVM Resolution 50/20; SUSEP Circular Letter 612/20.
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 are representative of all the LE's branches	Yes
96 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
97	If appropriate, provide any additional information/context to the answers in this section.	
10. SANC	TIONS	
98	Does the Entity have a Sanctions Policy approved by	
	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 Lists?	Yes
102	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?	Vendor-sourced tools
102 a1a	If a 'vendor-sourced tool' or 'both' selected, what is the name of the vendor/tool?	Accuity /Lexis Nexis
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 year
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 sanctions screening processes:	
106 a	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 Foreign Assets Control (OFAC)	Used for screening customers and beneficial owners and for filtering transactional data
106 c	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 and for filtering transactional data
106 e	Lists maintained by other G7 member countries	Not used
106 f	Other (specify)	
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?	Νο
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. TRAININ	IG & 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
112 112 a	Is the above mandatory training provided to:	V
112 a 112 b	Board and Senior Committee Management 1st Line of Defence	Yes
112 D 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
112 f	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?	
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	Voc
	Section are representative of all the LE's branches	Yes

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 Assurance programme for financial crime	Yes
	(separate from the independent Audit function)?	
118	Does the Entity have a program wide risk based	
	Compliance Testing process (separate from the	Yes
	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	
115 a	and the branch/es that this applies to.	
120	If appropriate, provide any additional	
	information/context to the answers in this section.	
13. AUDIT		
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	Yes
	AML, CTF, ABC, Fraud and Sanctions policies and	
	practices on a regular basis?	
122	How often is the Entity audited on its AML, CTF, ABC,	
	Fraud and Sanctions programme by the following:	
122 a	Internal Audit Department	Compenent-based reviews
122 b	External Third Party	Yearly
400	Does the internal audit function or other independent	
123		
	third party cover the following areas:	
123 123 a	third party cover the following areas: AML, CTF, ABC, Fraud and Sanctions policy and	Yes
123 a	third party cover the following areas: AML, CTF, ABC, Fraud and Sanctions policy and procedures	
	third party cover the following areas: AML, CTF, ABC, Fraud and Sanctions policy and	Yes
123 a 123 b	third party cover the following areas: AML, CTF, ABC, Fraud and Sanctions policy and procedures Enterprise Wide Risk Assessment	
123 a 123 b 123 c	third party cover the following areas: AML, CTF, ABC, Fraud and Sanctions policy and procedures Enterprise Wide Risk Assessment Governance	Yes Yes
123 a 123 b 123 c 123 d	third party cover the following areas: AML, CTF, ABC, Fraud and Sanctions policy and procedures Enterprise Wide Risk Assessment Governance KYC/CDD/EDD and underlying methodologies	Yes Yes Yes
123 a 123 b 123 c 123 d 123 e 123 f 123 g	third party cover the following areas: AML, CTF, ABC, Fraud and Sanctions policy and procedures Enterprise Wide Risk Assessment Governance KYC/CDD/EDD and underlying methodologies Name Screening & List Management Reporting/Metrics & Management Information Suspicious Activity Filing	Yes Yes Yes Yes
123 a 123 b 123 c 123 d 123 e 123 f 123 g 123 h	third party cover the following areas: AML, CTF, ABC, Fraud and Sanctions policy and procedures Enterprise Wide Risk Assessment Governance KYC/CDD/EDD and underlying methodologies Name Screening & List Management Reporting/Metrics & Management Information Suspicious Activity Filing Technology	Yes Yes Yes Yes Yes Yes Yes
123 a 123 b 123 c 123 d 123 e 123 f 123 g 123 h 123 i	third party cover the following areas: AML, CTF, ABC, Fraud and Sanctions policy and procedures Enterprise Wide Risk Assessment Governance KYC/CDD/EDD and underlying methodologies Name Screening & List Management Reporting/Metrics & Management Information Suspicious Activity Filing Technology Transaction Monitoring	Yes Yes Yes Yes Yes Yes Yes Yes
123 a 123 b 123 c 123 d 123 e 123 f 123 g 123 h 123 i 123 j	third party cover the following areas: AML, CTF, ABC, Fraud and Sanctions policy and procedures Enterprise Wide Risk Assessment Governance KYC/CDD/EDD and underlying methodologies Name Screening & List Management Reporting/Metrics & Management Information Suspicious Activity Filing Technology Transaction Monitoring Transaction Screening including for sanctions	Yes Yes Yes Yes Yes Yes Yes Yes Yes
123 a 123 b 123 c 123 d 123 e 123 f 123 g 123 h 123 i 123 j 123 k	third party cover the following areas: AML, CTF, ABC, Fraud and Sanctions policy and procedures Enterprise Wide Risk Assessment Governance KYC/CDD/EDD and underlying methodologies Name Screening & List Management Reporting/Metrics & Management Information Suspicious Activity Filing Technology Transaction Monitoring Transaction Screening including for sanctions Training & Education	Yes Yes Yes Yes Yes Yes Yes Yes
123 a 123 b 123 c 123 d 123 e 123 f 123 g 123 h 123 i 123 j	third party cover the following areas: AML, CTF, ABC, Fraud and Sanctions policy and procedures Enterprise Wide Risk Assessment Governance KYC/CDD/EDD and underlying methodologies Name Screening & List Management Reporting/Metrics & Management Information Suspicious Activity Filing Technology Transaction Monitoring Transaction Screening including for sanctions	Yes Yes Yes Yes Yes Yes Yes Yes Yes
123 a 123 b 123 c 123 d 123 e 123 f 123 g 123 h 123 i 123 j 123 k	third party cover the following areas: AML, CTF, ABC, Fraud and Sanctions policy and procedures Enterprise Wide Risk Assessment Governance KYC/CDD/EDD and underlying methodologies Name Screening & List Management Reporting/Metrics & Management Information Suspicious Activity Filing Technology Transaction Monitoring Transaction Screening including for sanctions Training & Education	Yes Yes Yes Yes Yes Yes Yes Yes Yes
123 a 123 b 123 c 123 d 123 e 123 f 123 g 123 h 123 i 123 j 123 k	third party cover the following areas: AML, CTF, ABC, Fraud and Sanctions policy and procedures Enterprise Wide Risk Assessment Governance KYC/CDD/EDD and underlying methodologies Name Screening & List Management Reporting/Metrics & Management Information Suspicious Activity Filing Technology Transaction Monitoring Transaction Screening including for sanctions Training & Education	Yes Yes Yes Yes Yes Yes Yes Yes Yes
123 a 123 b 123 c 123 d 123 e 123 f 123 g 123 h 123 i 123 j 123 k	third party cover the following areas: AML, CTF, ABC, Fraud and Sanctions policy and procedures Enterprise Wide Risk Assessment Governance KYC/CDD/EDD and underlying methodologies Name Screening & List Management Reporting/Metrics & Management Information Suspicious Activity Filing Technology Transaction Monitoring Transaction Screening including for sanctions Training & Education Other (specify) Are adverse findings from internal & external audit	Yes Yes Yes Yes Yes Yes Yes Yes Yes
123 a 123 b 123 c 123 d 123 e 123 f 123 g 123 h 123 i 123 j 123 k 123 I	third party cover the following areas: AML, CTF, ABC, Fraud and Sanctions policy and procedures Enterprise Wide Risk Assessment Governance KYC/CDD/EDD and underlying methodologies Name Screening & List Management Reporting/Metrics & Management Information Suspicious Activity Filing Technology Transaction Monitoring Transaction Screening including for sanctions Training & Education Other (specify) Are adverse findings from internal & external audit tracked to completion and assessed for adequacy	Yes Yes Yes Yes Yes Yes Yes Yes Yes
123 a 123 b 123 c 123 d 123 d 123 f 123 g 123 h 123 i 123 j 123 k 123 l 124	third party cover the following areas: AML, CTF, ABC, Fraud and Sanctions policy and procedures Enterprise Wide Risk Assessment Governance KYC/CDD/EDD and underlying methodologies Name Screening & List Management Reporting/Metrics & Management Information Suspicious Activity Filing Technology Transaction Monitoring Transaction Screening including for sanctions Training & Education Other (specify) Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness?	Yes
123 a 123 b 123 c 123 d 123 e 123 f 123 g 123 h 123 i 123 j 123 k 123 I	third party cover the following areas: AML, CTF, ABC, Fraud and Sanctions policy and procedures Enterprise Wide Risk Assessment Governance KYC/CDD/EDD and underlying methodologies Name Screening & List Management Reporting/Metrics & Management Information Suspicious Activity Filing Technology Transaction Monitoring Transaction Screening including for sanctions Training & Education Other (specify) Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness? Confirm that all responses provided in the above	Yes
123 a 123 b 123 c 123 d 123 d 123 f 123 g 123 h 123 j 123 k 123 j 123 k 123 l 124 125	third party cover the following areas: AML, CTF, ABC, Fraud and Sanctions policy and procedures Enterprise Wide Risk Assessment Governance KYC/CDD/EDD and underlying methodologies Name Screening & List Management Reporting/Metrics & Management Information Suspicious Activity Filing Technology Transaction Monitoring Transaction Screening including for sanctions Training & Education Other (specify) Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness? Confirm that all responses provided in the above section are representative of all the LE's branches	Yes
123 a 123 b 123 c 123 d 123 d 123 f 123 g 123 h 123 i 123 j 123 k 123 l 124	third party cover the following areas: AML, CTF, ABC, Fraud and Sanctions policy and procedures Enterprise Wide Risk Assessment Governance KYC/CDD/EDD and underlying methodologies Name Screening & List Management Reporting/Metrics & Management Information Suspicious Activity Filing Technology Transaction Monitoring Transaction Screening including for sanctions Training & Education Other (specify) Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness? 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	Yes
123 a 123 b 123 c 123 d 123 d 123 f 123 g 123 h 123 j 123 k 123 j 123 k 123 l 124 125	third party cover the following areas: AML, CTF, ABC, Fraud and Sanctions policy and procedures Enterprise Wide Risk Assessment Governance KYC/CDD/EDD and underlying methodologies Name Screening & List Management Reporting/Metrics & Management Information Suspicious Activity Filing Technology Transaction Monitoring Transaction Screening including for sanctions Training & Education Other (specify) Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness? Confirm that all responses provided in the above section are representative of all the LE's branches	Yes
123 a 123 b 123 c 123 d 123 d 123 f 123 g 123 h 123 j 123 k 123 j 123 k 123 l 124 125	third party cover the following areas: AML, CTF, ABC, Fraud and Sanctions policy and procedures Enterprise Wide Risk Assessment Governance KYC/CDD/EDD and underlying methodologies Name Screening & List Management Reporting/Metrics & Management Information Suspicious Activity Filing Technology Transaction Monitoring Transaction Screening including for sanctions Training & Education Other (specify) Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness? 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	Yes
123 a 123 b 123 c 123 d 123 d 123 f 123 g 123 h 123 j 123 k 123 j 123 k 123 l 124 125	third party cover the following areas: AML, CTF, ABC, Fraud and Sanctions policy and procedures Enterprise Wide Risk Assessment Governance KYC/CDD/EDD and underlying methodologies Name Screening & List Management Reporting/Metrics & Management Information Suspicious Activity Filing Technology Transaction Monitoring Transaction Screening including for sanctions Training & Education Other (specify) Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness? 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.	Yes
123 a 123 b 123 c 123 d 123 e 123 f 123 g 123 h 123 j 123 k 123 l 123 l 123 z 123 k 123 l	third party cover the following areas: AML, CTF, ABC, Fraud and Sanctions policy and procedures Enterprise Wide Risk Assessment Governance KYC/CDD/EDD and underlying methodologies Name Screening & List Management Reporting/Metrics & Management Information Suspicious Activity Filing Technology Transaction Monitoring Transaction Screening including for sanctions Training & Education Other (specify) Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness? 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	Yes
123 a 123 b 123 c 123 d 123 e 123 f 123 g 123 h 123 j 123 k 123 l 123 l 123 z 123 k 123 l	third party cover the following areas: AML, CTF, ABC, Fraud and Sanctions policy and procedures Enterprise Wide Risk Assessment Governance KYC/CDD/EDD and underlying methodologies Name Screening & List Management Reporting/Metrics & Management Information Suspicious Activity Filing Technology Transaction Monitoring Transaction Screening including for sanctions Training & Education Other (specify) Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness? 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.	Yes
123 a 123 b 123 c 123 d 123 e 123 f 123 g 123 h 123 j 123 k 123 l 123 l 123 z 123 k 123 l	third party cover the following areas: AML, CTF, ABC, Fraud and Sanctions policy and procedures Enterprise Wide Risk Assessment Governance KYC/CDD/EDD and underlying methodologies Name Screening & List Management Reporting/Metrics & Management Information Suspicious Activity Filing Technology Transaction Monitoring Transaction Screening including for sanctions Training & Education Other (specify) Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness? 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.	Yes
123 a 123 b 123 c 123 d 123 d 123 f 123 g 123 h 123 j 123 k 123 J 123 k 123 I 124 125 125 a 126	third party cover the following areas: AML, CTF, ABC, Fraud and Sanctions policy and procedures Enterprise Wide Risk Assessment Governance KYC/CDD/EDD and underlying methodologies Name Screening & List Management Reporting/Metrics & Management Information Suspicious Activity Filing Technology Transaction Monitoring Transaction Screening including for sanctions Training & Education Other (specify) Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness? 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.	Yes
123 a 123 b 123 c 123 d 123 d 123 f 123 g 123 h 123 i 123 j 123 k 123 l 124 125 125 a	third party cover the following areas: AML, CTF, ABC, Fraud and Sanctions policy and procedures Enterprise Wide Risk Assessment Governance KYC/CDD/EDD and underlying methodologies Name Screening & List Management Reporting/Metrics & Management Information Suspicious Activity Filing Technology Transaction Monitoring Transaction Screening including for sanctions Training & Education Other (specify) Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness? 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.	Yes Yes
123 a 123 c 123 d 123 e 123 i 123 j 123 k 123 l 123 z 123 j 123 k 123 l 125 125 a 126 14. FRAUI 127	third party cover the following areas: AML, CTF, ABC, Fraud and Sanctions policy and procedures Enterprise Wide Risk Assessment Governance KYC/CDD/EDD and underlying methodologies Name Screening & List Management Reporting/Metrics & Management Information Suspicious Activity Filing Technology Transaction Monitoring Transaction Screening including for sanctions Training & Education Other (specify) Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness? 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. Does the Entity have policies in place addressing fraud risk?	Yes
123 a 123 b 123 c 123 d 123 d 123 f 123 g 123 h 123 j 123 k 123 l 123 k 123 l 125 a 126 14. FRAUI	third party cover the following areas: AML, CTF, ABC, Fraud and Sanctions policy and procedures Enterprise Wide Risk Assessment Governance KYC/CDD/EDD and underlying methodologies Name Screening & List Management Reporting/Metrics & Management Information Suspicious Activity Filing Technology Transaction Monitoring Transaction Screening including for sanctions Training & Education Other (specify) Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness? 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.	Yes Yes

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.	

Declaration Statement

Wolfsberg Group Correspondent Banking Due Diligence Questionnaire 2023 (CBDDQ V1.4)

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 DO ESTADO DO RIO GANDE DO SUL S.A. _ (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 every eighteen months.

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

VERNO KIRST

_ (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

ANDRE SILVEIRA

(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.

(Signature & Date)

(Signature & Date)