

Anti – Money Laundering Questionnaire

General Information

Financial Institution Name: **Banco Bradesco S.A.**

Physical Address: **Cidade de Deus, S/N, Vila Yara – CEP: 06029-900 – Osasco,
São Paulo – Brasil**

Website: www.bradesco.com.br

Swift Address: **BBDEBRSP**

Date Established: **10/03/1943**

Stock exchange listed: **BOVESPA (São Paulo Stock Exchange);**

Bolsa de Madrid – Latibex (Madrid Stock Exchange);

NYSE (New York Stock Exchange)

Supervisory Authority: **Banco Central do Brasil (Central Bank of Brazil)**

Registration/ License nº: **CNPJ 60.746.948/0001-12 / NIRE 35.300.027.795**

I. General AML Policies, Practices and Procedures:	Yes	No
1. Is the AML compliance program approved by the FI's board or a senior committee?	Yes	
2. Does the FI have a legal and regulatory compliance program that includes a designated Compliance officer that is responsible for coordinating and overseeing the AML framework?	Yes	
3. Has the FI developed written policies documenting the processes that they have in place to prevent, detect and report suspicious transactions?	Yes	
4. In addition to inspections by the government supervisors/regulators, does the FI client have an internal audit function or other independent third party that assesses AML policies and practices on a regular basis?	Yes	
5. Does the FI have a policy prohibiting accounts/relationships with shell banks? (A shell bank is defined as a bank incorporated in a jurisdiction in which it has no physical presence and which is unaffiliated with a regulated financial group.)	Yes	
6. Does the FI have policies to reasonably ensure that they will not conduct transactions with or on behalf of shell banks through any of its accounts or products?	Yes	
7. Does the FI have policies covering relationships with Politically Exposed Persons (PEP's), their family and close associates?	Yes	
8. Does the FI have record retention procedures that comply with applicable law?	Yes	
9. Are the FI's AML policies and practices being applied to all branches and subsidiaries of the FI both in the home country and in locations outside of that jurisdiction? Comments: All Bradesco Group's branches and subsidiaries are required to comply with the parent company's AML/ATF program, observing, with respect to our branches and subsidiaries abroad, their jurisdiction's applicable laws and regulations.	Yes	
II. Risk Assessment	Yes	No
10. Does the FI have a risk-based assessment of its customer base and their transactions?	Yes	
11. Does the FI determine the appropriate level of enhanced due diligence necessary for those categories of customers and transactions that the FI has reason to believe pose a heightened risk of illicit activities at or through the FI?	Yes	
III. Know Your Customer, Due Diligence and Enhanced Due Diligence	Yes	No
12. Has the FI implemented processes for the identification of those customers on whose behalf it maintains or operates accounts or conducts transactions?	Yes	



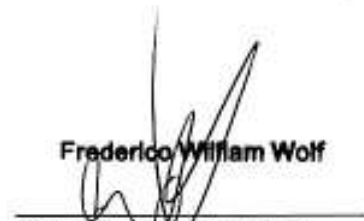
13. Does the FI have a requirement to collect information regarding its customers' business activities?	Yes	
14. Does the FI assess its FI customers' AML policies or practices? The correspondent banking relationships that Bradesco establishes and maintains for both domestic and international financial institutions are subject to our corporate know-your-customer policy, which provides that the Group's Branches, Departments and Affiliates must adopt the necessary precautions to obtain the full identification of their customers, investors, savers and consumers of products and/or services, maintaining full knowledge of the transactions conducted in their premises, acting in a preventive way as to suspicious transactions and/or situations which may be directly or indirectly connected to the crimes related to money laundering and the financing of terrorism. Furthermore, our policy establishes that all officers and employees must comply with the rules conducting the opening of accounts and the sale of products and services, obtaining, documenting and maintaining customer data updated, knowing the relevant activities, source of income, origin and allocation of funds, economic and financial profile and expected nature of transactions of deposit, savings or investment accounts. Additionally, they must monitor customers' transactions, whether they are individuals, corporate entities or financial institutions.	Yes	
15. Does the FI have a process to review and, where appropriate, update customer information relating to high risk client information?	Yes	
16. Does the FI have procedures to establish a record for each new customer noting their respective identification documents and 'Know Your Customer' information?	Yes	
17. Does the FI complete a risk-based assessment to understand the normal and expected transactions of its customers?	Yes	
IV. Reportable Transactions and Prevention and Detection of Transactions with Illegally Obtained Funds	Yes	No
18. Does the FI have policies or practices for the identification and reporting of transactions that are required to be reported to the authorities?	Yes	
19. Where cash transaction reporting is mandatory, does the FI have procedures to identify transactions structured to avoid such obligations?	Yes	
20. Does the FI screen customers and transactions against lists of persons, entities or countries issued by government/competent authorities? Although Bradesco's domestic branches may transact with Brazilian currency only, Bradesco periodically performs crossing of its database with international lists. Domestic branches are required to apply the know-your-customer Policy and comprehensive customer identification procedures for account opening pursuant to Brazilian laws and regulations designed to prevent the Institution from doing business with entities and/or persons that engage in illegal activity. Foreign Exchange transactions, including international transfers of funds (inflows and outflows), are executed by the International Department, and are carried out with customers who are account holders of our domestic branches. International transactions are subject to a prior careful analysis, especially in relation to the parties involved (originators and beneficiaries), country of origin and destination, volume, nature and purpose of the transaction, and this analysis includes verifying whether they involve OFAC embargoed countries or Financial Action Task Force on Money Laundering – FATF's Non Cooperative Countries and Territories, or the individuals and entities notified by the competent regulatory authorities. International operations are conducted pursuant to the International Capital and Foreign Exchange Market Regulation, which requires that Institutions authorized to operate in the foreign exchange market, must record at the Central Bank's Information System the foreign exchange operations performed, which are subject to monitoring and supervision by the Central Bank of Brazil.	Yes	

21. Does the FI have policies to reasonably ensure that it only operates with correspondent banks that possess licenses to operate in their countries of origin?	Yes	
22. Does the FI adhere to the Wolfsberg Transparency Principles and the appropriate usage of the SWIFT MT 202/202COV and MT 205/205COV message formats?1	Yes	
V. Transaction Monitoring	Yes	No
23. Does the FI have a monitoring program for or unusual and potentially suspicious activity that covers funds transfers and monetary instruments such as travelers checks, money orders, etc?	Yes	
VI. AML Training	Yes	No
24. Does the FI provide AML training to relevant employees that includes: <ul style="list-style-type: none"> • Identification and reporting of transactions that must be reported to government authorities; • Examples of different forms of money laundering involving the FI's products and services; • Internal policies to prevent money laundering. 	Yes	
25. Does the FI retain records of its training sessions including attendance records and relevant training materials used?	Yes	
26. Does the FI communicate new AML related laws or changes to existing AML related policies or practices to relevant employees?	Yes	
27. Does the FI employ third parties to carry out some of the functions of the FI?		No
28. If the answer to question 26 is yes, does the FI provide AML training to relevant third parties that includes: <ul style="list-style-type: none"> • Identification and reporting of transactions that must be reported to government authorities; • Examples of different forms of money laundering involving the FI's products and services; • Internal policies to prevent money laundering. 	N/A	

Banco Bradesco S.A.



Bruno D'Avila Melo Boetger
Department Director



Frederico William Wolf
Department Director

Date: August, 5 2016.

Space for additional information:
(Please indicate which question the information is referring to.)

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