

BANCO CAIXA GERAL ANGOLA

AML Policy

1. Institutional Information

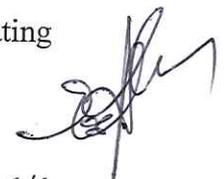
- **Name:** Banco Caixa Geral Angola, S.A. (BCGA)
- **Address:** Avenida 4 de Fevereiro, n. 99
- **Swift Code:** BCGAOLU
- **Legal Status:** Joint Stock Company with Mixed Capital
- **Shareholders:** CAIXA GENERAL DE DEPÓSITOS, ANTÓNIO MOSQUITO, JOSÉ JAIME AGOSTINHO DE SOUSA FREITAS and OTHERS.
- **Regulator:** National Bank of Angola (BNA).
- **Institution Code:** 004
- **External Auditors:** PWC – PricewaterhouseCoopers
- **Contact:** Compliance Officer - Compliance Office Support. Telephone: +244 226 424 466 Fax: +244 226 424 411
Email: compliance@caixaangola.ao

2. Relevant National and International Standards International Standards and Recommendations

- 40 FATF Recommendations on money laundering and terrorist financing and combating weapons of mass destruction prevention.
- The United Nations Convention against Illicit Traffic in Narcotic Drugs and Psychotropic Substances.
- The United Nations Convention against transnational organized crime.
- United Nations International Convention for the Suppression of the Financing of Terrorism.

National Law and Regulations.

- Law No. 05/2020 of January 27th (Law to Combat Money Laundering and Terrorist Financing - AML/FT).
- Law No. 19/2017 of August 25th (Law on Preventing and Combating Terrorism).



- Law No. 01/2012 of 12 January (Law on the Designation and Execution of Acts of International Law).
- BNA Notice No. 14/2020 of June 22nd (Rules for Preventing and Combating Money Laundering and Money and Terrorist Financing provided for in Law No. 05/2020 - AML/FT Law).
- Ordinance No. 03/DSI/2012 of July 24 (Identification and Communication of Designated Persons, Groups and Entities), which regulates the conditions for exercising the obligations provided for in Law No. 01/2012.
- Ordinance No. 04/DSI/2012 of 24 July (Funds and Asset Freezing), which regulates the conditions for exercising mandatory obligations under Law No. 01/2012.

3. Measures to Combat Money Laundering and the Financing of Terrorism of the BCGA.

The BCGA has implemented internal procedures to ensure compliance with national Anti-Money Laundering and Terrorist Financing legislation. The BCGA has an AML/FT program, duly approved by the Executive Committee, which identifies, mitigates and manages the risk of money laundering and terrorist financing.

Know Your Customer – KYC and Customer Monitoring:

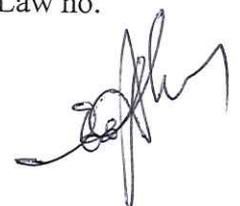
The BCGA has internal policies and procedures that ensure compliance with the Obligation to identify its customers and uses technological tools. Monitoring of transactions carried out by its customers, which are regularly tracked by comparison with relevant lists to identify individuals and Politically Exposed Persons (PPE's).

Politically Exposed Persons (PEPs):

The BCGA closely monitors transactions in which customers or beneficiaries are PPEs.

Holders of Other Political or Public Positions:

The BCGA monitors to a greater extent transactions in which clients or beneficiaries hold or have held political or public positions as defined in Law no. 05/2020 of January 27th.



Anonymous or numbered accounts:

The BCGA does not provide its customers with products and services in the form of anonymous or numbered accounts.

Document Conservation:

Documents relating to the identification of its customers, as well as proof of the transaction, are kept for a period of 10 years and 5 years respectively after the conclusion of the transaction.

Correspondent banking:

The BCGA has risk-based Due Diligence procedures, which include knowledge of the nature of the corresponding business, its license to operate, the quality of its management, ownership and effective control of its AML/FT policies. Additionally, continuous monitoring of correspondent accounts is carried out when the establishment of correspondence relationships, regardless of their level of risk, is subject to deliberation by the Executive Committee, with a prior opinion from the *Compliance* Direction

AML Wolfsberg Questionnaire:

The BCGA Wolfsberg AML Questionnaire is available on the Bank's institutional website: www.caixanagola.ao.

Shell bank:

The BCGA does not establish or maintain commercial relationships with shell banks, as defined in Law No. 05/2020 of January 27th.

Payable through accounts:

The BCGA does not provide this type of service.

Assessment of transfers against international lists:

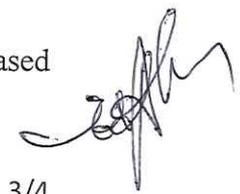
The BCGA is equipped with a software solution to filter inbound and outbound transfers against EU, UN and OFAC lists.

Sanctions Policy:

The BCGA has implemented a set of policies and procedures with the aim of certifying that the institution does not establish or maintain commercial relationships, nor process operations for/for the benefit of sanctioned individuals, entities or countries.

The BCGA Sanctions Policy is available on the institutional website: www.caixaangola.ao.

The BCGA employees monitor suspicious transactions through a risk-based approach and a technological solution.



Reporting Suspicious Operations:

The BCGA has internal policies and procedures to enforce the legal obligation to report to the Financial Intelligence Unit, operations suspected of forming money laundering and terrorist financing.

Reporting relevant bank transactions on accounts and verifying transfers:

The BCGA reports banking transactions of an amount equal to or greater than the equivalent in Kwanzas of \$15,000 to the Financial Information Unit.

Training:

The BCGA provides all its employees and managers with training in Combating Money Laundering and Terrorist Financing.

Employee Monitoring: BCGA has implemented policies and procedures that guarantee the security of identity, honesty and integrity of employees. Independent

Audit and Review of the Compliance Function:

Internal Audit has evaluation programs for the Compliance Function with the aim of ensuring its effectiveness. In turn, the BCGA Compliance Department ensures compliance with all operational policies and procedures related to Combating Money Laundering and Financial Financing. Terrorism and Proliferation of Weapons of Mass Destruction. The Audit and Compliance programs are approved by the BCGA Board of Directors, after prior opinion from the Executive Committee and Audit and Internal Control Committee.

August 2022,

Manager of the Compliance Function

[Edson Cunha e Almeida]

