CaixaBank, S.A.
Diagonal, 621 (08028) Barcelona, Spain

CAIXABANK AML/ CFT & SANCTIONS QUESTIONNAIRE

Knowing Your Customer (KYC)
Anti-Money Laundering
Prevention of Terrorist Financing and Sanctions

Section A. General information about the Institution	
Full Legal Institution Name	CaixaBank, S.A.
Trading name(s) used (if different of the above):	"la Caixa"
Legal Entity Identifier (LEI)	7CUNS533WID6K7DGFI87
Identification Number of Company	C.I.F: A08663619
Full address of the registered office	Street and town: Avenida Diagonal 621, (08028) Barcelona
	Country: Spain
Full address of the location of head office	Street and town: Same as above
	Country: Same as above
Principal Place of Business (Address)	Street and town: Same as above
	Country: Same as above
BIC code	CAIX ES BB
Website address:	http://www.caixabank.com

Section B. Customer base	
Do you have customers who operate in the following areas:	
Retail customers	YES ☒ NO ☐
Corporate customers	YES ☒ NO ☐
Governments/Supranational	YES ☒ NO ☐
Non-Banks Financial Institutions	YES ☒ NO ☐
Private Banking	YES ☒ NO ☐ If yes, Specify whether the entity has restrictions or/and applies specific enhanced due diligences measures with the industries listed: YES ☒ NO ☐
Correspondent Banks	YES ☒ NO ☐ If yes, Specify whether the entity has restrictions or/and applies specific enhanced due diligences measures with the industries listed: YES ☒ NO ☐
Money service business (e.g. Currency Exchange Houses, Money Remitters, Casas de Cambio, Foreign Exchange Providers)	YES ☒ NO ☐ If yes, Specify whether the entity has restrictions or/and applies specific enhanced due diligences measures with the industries listed: YES ☒ NO ☐
Gaming, casinos or gambling	YES ☒ NO ☐ If yes, Specify whether the entity has restrictions or/and applies specific enhanced due diligences measures with the industries listed: YES ☒ NO ☐

Arms and munitions	YES ☒ **Whenever no arms/defence/military issues are involved.** If yes, Specify whether the entity has restrictions or/and applies specific enhanced due diligences measures with the industries listed: YES ☒ NO ☐
Atomic power	YES ☒ NO ☐ If yes, Specify whether the entity has restrictions or/and applies specific enhanced due diligences measures with the industries listed: YES ☒ NO ☐
Jewellery/Precious Metal Sales	YES ☒ NO ☐ If yes, Specify whether the entity has restrictions or/and applies specific enhanced due diligences measures with the industries listed: YES ☒ NO ☐
Charitable Foundations and Non-Governmental Organizations	YES ☒ NO ☐ If yes, Specify whether the entity has restrictions or/and applies specific enhanced due diligences measures with the industries listed: YES ☒ NO ☐
Section C. Customer Location (s)	
Are more than 10% of your customers located in a country other than where you are domiciled?	YES ☒ NO ☒
If Yes to above, please list the top 3 country locations of these customers:	➢
	➢
	➢
Section D. Type of Products and Services Offered	
Banking services	☒ Mobile banking ☒ Online banking
Banking products	☒ Loans ☒ Credit cards ☒ Bonds ☒ Money markets ☒ Syndicated loans
Cash services	☐ Bulk cash activities ☒ Cash management services, including deposit accounts ☒ Cash letters/cheque clearings ☒ International funds transfers
Market products	☒ Foreign currency dealing ☒ Investment advisers/investment banking ☐ Overnight investment accounts (sweep accounts) ☒ Insurance ☐ Islamic banking ☒ Derivatives and similar instruments (Spots/Swaps/Options)
Trade Finance	☒ Documentary collection ☒ Letters of credit ☒ Guarantees ☒ Standby L/C

Section E.	
1. Does your group maintain **presence or business** in **High-risk and non-cooperative jurisdictions,** currently subject to a FATF **Call for Action:** http://www.fatf-gafi.org/countries/	YES ☐ NO ☒ If "YES", please list them:
Regulatory Status	
2. License	YES ☒ NO ☐ If "YES", indicate: → Name of Regulatory Body and website: Bank of Spain → Number: 2100
3. Is your licence subject to any type of restriction?	YES ☐ NO ☒ If "YES", state the restriction and attach a copy of your licence.
4. Is your entity subject to supervision and control concerning the Anti money laundering and counter-financing of terrorism?	YES ☒ NO ☐ If "YES", indicate: Name of the competent Authority and website: Bank of Spain. Executive Service of the Commission for the Prevention of Money Laundering and Monetary Offences (SEPBLAC) and by "Comision Nacional del Mercado de Valores" (CNMV)
5. Has your institution the "USA Patriot Act Certificate"?	YES ☒ NO ☐ If "YES", please attach a copy.
Ownership and Control Structure/Beneficial Owners	
What is the legal form of you Institution?	"Sociedad Anónima"
6. Shareholder structure	**State Owned Company** ☐ If yes, please state: → The percentage (%): → Country of ownership: **Private company** ☒
7. Is your institution publicly listed?	YES ☒ NO ☐ If "YES": → Name of stock exchange (s): Company shares are listed on the stock exchanges of Madrid, Barcelona, Bilbao and Valencia through the Stock market Interconnection System (Continuous Market). Trading name: CaixaBank Currency: EUR → Country of stock exchange (s): Spain

8. Parent Company:

YES ☒ N/A ☐

If "YES":

→ Legal name: Criteria Caixa, S.A.U. (A63379135)

http://www.criteria.com/index_en.html

→ Registered Address/Country: Avda. Diagonal 621 (08028) Barcelona, Spain

→ Ownership interest (%):40%

- Is it a Payment Institution? YES ☐ NO ☒
- Is it publicly listed? YES ☐ NO ☒

If "YES":

→ Name of stock exchange (s):
→ Country of stock exchange (s):

9. Ownership Information-Shareholding Companies

Not to be answered when the entity:

→ **Is listed on a regulated market (EU member states or equivalent third countries (*)).**

(*) Decision on Equivalent Jurisdictions, published in the Official State Gazette 23 August 2012, Australia, Brazil, Canada, Hong Kong, India, Japan, Mexico, Singapore, Republic of Korea (South Korea), Switzerland, South Africa, The United States.

List of companies owning or controlling, directly and/or indirectly, 10% or more of the entity's shares:

Legal Name	Country	Ownership interest (%)	Nature of ownership (direct/indirect)
Criteria Caixa, S.A.U. Wholly owned by Fundación Bancaria Caixa d'Estalvis i Pensions de Barcelona "la Caixa" (Spain)	Spain	40%	Direct
Fundación Bancaria Caixa d'Estalvis i Pensions de Barcelona	Spain	40%	Indirect

10. Ultimate Beneficial Owners(natural persons, threshold 10%, direct or indirect ownership):

Not to be answered when the entity:

→ **Is listed on a regulated market (EU member states or equivalent third countries (*)).**

→ **Is owned over 50% by EU member states or equivalent third countries (*).**

(*) Decision on Equivalent Jurisdictions, published in the Official State Gazette 23 August 2012, Australia, Brazil, Canada, Hong Kong, India, Japan, Mexico, Singapore, Republic of Korea (South Korea), Switzerland, South Africa, The United States.

For all other cases, please provide the required information in the correspondent field.

☒ We confirm that **no natural person controls or owns directly and/or indirectly 10% or more** of our shares or exercise control over the management of the entity.

☐ We confirm that our **Ultimate Beneficial Owners** are as follows and that no other natural person controls or owns directly and/or indirectly 10% or more of our shares or exercise control over the management of the entity.

Provide the following details for individual beneficial owners (10% or more):

Full name	Date of birth	Country of Residence	Nationality

If you cannot get the information of the percentage of indirect control, please explain and prove why.

FI Board and Executive Management Details			
State whether your institution has any Politically Exposed Persons (PEPs) within the bank's executive bodies		YES ☐	NO ☒
If "YES", Please also specify the position that they hold on the Board (e.g. Chairperson, Non-Executive Director, etc.):			
Full name	Nationality	Date of birth	Position

Section F.

I. General AML Policies, Practices and Procedures	YES	NO
11. Do you have a compliance and regulatory program of Anti Money Laundering and Combat the Financing of Terrorism (AML/CFT/Sanctions & Embargoes), which requires the approval of the Board or Senior Committee?	☒	☐
12. Does the board/senior committee receive regular management information reporting on AML/CFT/Sanctions & Embargoes matters?	☒	☐
13. Do you have a legal and regulatory compliance program that includes a designated officer that is responsible for coordinating and overseeing the AML/CFT/Sanctions & Embargoes framework? If Yes, please provide the following information:	☒	☐
• Name: Javier Punset		
• Position Title: Head of AML Department		
• Mailing address: prevenciondeblanqueo_int@caixabank.com		
• Telephone number: +34 934 044 673		
14. Have you developed written policies/procedures documenting the processes that you have in place to prevent, detect and report suspicious transactions?	☒	☐
15. In addition to inspections by government supervisors/regulators, do you have an internal audit function or other independent third party that assesses the adequacy of your AML/CFT/Sanctions & Embargoes policies and practices on a regular basis?	☒	☐
16. Does your Institution maintain a physical presence in the licensing country?	☒	☐
If "NO", is it affiliated with a regulated financial group?	☐	☐
Do you have policies to reasonably ensure that you will not conduct transactions with or on behalf of shell banks through any of its accounts or products?	☒	☐
17. Do you have policies covering relationships with "Politically Exposed Persons "(PEP's), their family and close associates and apply Enhanced Due Diligence to these customers?	☒	☐
18. Do you have record retention procedures that comply with applicable law?	☒	☐
If "YES", which is the period of conservation? 10 years		
19. Are your policies and practises being applied to your parent, all branches, and subsidiaries, both in the home country and in locations outside of that jurisdiction?	☒	☐
II. Risk Assessment	YES	NO
20. Do you have a risk-based assessment of your customer base and their transactions?	☒	☐
21. Do you 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?	☒	☐
III. Know Your Customer, Due Diligence and Enhanced Due Diligence	YES	NO
22. Have you implemented processes for the identification of those customers on whose behalf it maintains or operates accounts or conducts transactions?	☒	☐
23. Do you have obligations to collect information relating to the customer's and beneficial owner (s)' source of wealth and source of funds?	☒	☐
24. Do you apply the customer due diligence measures (CDD) on institutions to which you offer Correspondent Banking services in accordance with the Wolfsberg Principles for Correspondent Banks?	☒	☐
25. Do you have a requirement to collect information regarding your customers' business activities?	☒	☐
26. Do you assess your financial institution customers' AML/TF/Sanctions & Embargoes, policies or practises?	☒	☐
27. Do you complete a risk-based assessment to understand the normal and expected transactions of your customers?	☒	☐

28. Do you have a process to review and, where appropriate, update customer information for all clients? How frequently is customer due diligence/KYC information updated? It's a dynamic process, taking into consideration the KYC information and the customer's operating profile.	☒	☐
29. Do you have procedures to establish a record for each new customer noting their respective identification documents and "Know Your Customer" information?	☒	☐
IV. Reportable Transactions and Prevention and Detection of Transactions with illegally obtained Funds	**YES**	**NO**
30. Do you have policies or practices for the identification and reporting of transactions that are required to be reported to the authorities?	☒	☐
31. Where cash transaction reporting is mandatory, does your bank have procedures to identify transactions structured to avoid such obligations?	☒	☐
32. Do you have policies to reasonably ensure that it only operates with correspondent banks that possess licenses to operate in their countries of origin?	☒	☐
33. Do you adhere to the Wolfsberg Transparency Process and the appropriate use of the SWIFT MT202/202COV and MT205/205COV message formats?	☒	☐
V. Transaction Monitoring	**YES**	**NO**
34. Do you have a monitoring program to detect unusual and potentially suspected operations of money laundering or the financing of terrorism that covers funds transfer and other money instruments, such as traveller's cheques, money orders, etc.?	☒	☐
35. When applicable, does your institution request and include beneficial owner details for all corporate and correspondent customers? Are beneficial owners screened against: → Sanctions lists YES ☒ NO ☐ → PEPs (Politically Exposed Persons) database YES ☒ NO ☐	☒	☐
VI. AML Training	**YES**	**NO**
36. Do you provide AML/TF/Sanctions & Embargoes training to relevant employees that includes: → Identification and reporting of transactions that must be reported to government authorities? → Examples of different forms of money laundering involving your products/services? → Internal policies to prevent Anti- money laundering and combating the financing of terrorism?	☒	☐
37. Do you retain records of its training sessions including attendance records and relevant training materials used?	☒	☐
38. Do you communicate new AML/TF/Sanctions & Embargoes related laws or changes to existing AML/TF/Sanctions & Embargoes related policies or practices to relevant employees?	☒	☐
39. Do you employ third parties to carry out some of the AML/TF/Sanctions & Embargoes functions of the FI?	☒	☐
40. If the answer to question 39 is yes, do you provide AML/TF/Sanctions & Embargoes training to relevant third parties that includes: → Identification and reporting of transactions that must be reported to government authorities? → Examples of different forms of money laundering involving your products/services? → Internal policies to prevent Anti- money laundering and combating the financing of terrorism?	☒	☐
VII. Key Regulatory Issues	**YES**	**NO**
41. Has your institution established and maintain, on an ongoing basis an AML/TF/Sanctions & Embargoes compliance program?	☒	☐
42. Do you have a specific regulation to control the risks associated with the non face-to-face business relationships (phone banking, banking on-line...etc.) and relationships through intermediaries or third parties?	☒	☐
43. Do you offer anonymous accounts or numbered accounts, for which you does not have full particulars of the beneficial owner?	☐	☒
44. Do you send transfers or bank transactions on behalf of non-customers, without obtaining proof of identification?	☐	☒
45. Do you require full information on the issue of transfers, including the name of the originator and beneficiary, the address and account number?	☒	☐

VIII. Nested Account and Payable Through Accounts	YES	NO
46. In what currencies do you offer clearing services? EUR		
47. Does your institution offer **Payable through Account** (Clear-Through)? ** These are correspondent accounts that are used directly by third parties to transact business on their own behalf.* If "YES": → What due diligence do you carry out with respect to this category of accounts? → Estimate the number of such accounts, and their locations:	☐	☒
48. Do you provide undisclosed **Nested/Downstream** Correspondent bank accounts? **Nested accounts occur when a financial institution accesses the financial system in another country (in effect anonymously) by operating through a correspondent banking account belonging to another financial institution.* If "YES": → What due diligence do you carry out with respect to this category of accounts? → Estimate the number of such accounts, and their locations:	☐	☒

IX. Purpose of relationship	
What is the **intended purpose** of establishing/ maintaining a Relationship with CaixaBank?	☐ Swift RMA ☐ Correspondent Accounts ☐ Other. Please, specify:
Please describe the **nature and volume** of the business activity will be/are being transacted through the swift RMA and/or Correspondent Account	
Do you have other accounts in Spain?	YES ☐ NO ☐

X. AML/CFT Regulatory Environment

49. Has your institution or parent or firm belonging to the same group been subject, in the past two years, of any regulatory enforcement for inadequate AML/CFT policies and procedures and/or breaches of AML/CFT obligations?

YES ☐ NO ☒

CaixaBank is permanently monitored by Spanish Regulators. AML/FT CaixaBank Group's prevention procedures have been examined by Bank of Spain and SEPBLAC in 2014, 2015 and 2016. Some findings have been mentioned, related to some AML procedures, although none of them were material.
CaixaBank Group has undertaken a plan to improve and strengthen the AML/FT procedures. This plan has been submitted to the regulators that have welcomed the measures undertaken.

Full Legal Institution Name	Caixabank S.A.

Section G. Sanctions Statement / Questionnaire		
	YES	NO
1. Does your bank screen customers and transactions against official lists of persons, entities and/or countries issued by government/competent authorities?		
• United Nations	☒	☐
• European Union	☒	☐
• OFAC	☒	☐
• Other local regulations: UKHMT (Her Majesty's Treasury- United Kingdom)		
2. Do all clients undergo economic sanctions screening?	☒	☐
If "YES", what is the frequency of the screening? ☒Real-time ☒Daily / Nightly ☒Weekly ☐Monthly ☐Other If "Other" please explain:		
3. Do all transactions undergo economic sanctions screening?	☒	☐
If "YES", what is the frequency of the screening? ☒Real-time ☐Daily / Nightly ☐Weekly ☐Monthly ☐Other If "Other" please explain: Once the transaction is registered.		
4. Does your institution provide or maintain correspondent banking products/services to, with or for the benefit of, or on the direction or order of, an Iranian financial institution* or a subsidiary of an Iranian financial institution?	☐	☒
If "YES", please list the name of each Iranian financial institution or subsidiary thereof. **For the purposes of this questionnaire, an Iranian financial institution means a body corporate, trust, partnership, fund, unincorporated association or organization, established under the laws of Iran that engages, directly or indirectly, in the business of providing financial services.*		
5. If "YES" to question 4 does your institution apply enhanced due diligence (EDD) measures to transactions emanating from or destined to Iran (Iran EDD)?	☐	☐
Provide details: **Not yet** ☐ Provide details and expected date of Iran EDD implement:		
6. Do you have a presence in any Sanctioned Jurisdiction[1]?	☐	☒
If "YES", please indicate which one(s): – Burma/Myanmar ☐ – Crimea Region ☐ – Cuba ☐ – Iran ☐ – North Korea ☐ – Sudan ☐ – South Sudan ☐ – Syria ☐ Elaborate on how you ensure compliance with applicable sanctions laws or requirements.		

[1] **"Sanctioned Jurisdictions"** refer to Burma/Myanmar, Crimea Region, Cuba, Iran, North Korea, Sudan, South Sudan and Syria.

		YES	NO
7.	Does your institution have business relationship with customers in a Sanctioned Jurisdiction[1]?	☒	☐
	If "YES", please describe the type of business and policy applicable to those customers. Caixabank maintains business relationships in Cuba. It is prohibited to maintain relationships in US dollars or with any US nexus, including US goods. Activities that are permissible with Cuba in US dollars and/or with a US nexus according to OFAC general licenses are reviewed on a case-by-case basis. Documentary payments (mainly export letters of credit, but also import letter of credits and export and import documentary collections), to export from Spain to Cuba between individuals and companies. All transactions are in Euro currency and are checked against Watch Lists before being executed. As group policy, operations in or related to Sudan, South Sudan, North Korea, Iran, and/or Syria are prohibited.		
8.	Does your institution conduct any activity with the Sanctioned Jurisdictions; or with Russian state owned entities; or with sanctions targets[2]:	☒	☐
	If "YES", please describe the activity the Institution conducts with the Sanctioned Jurisdiction; or with Russian state owned entities; or with sanctions targets: CaixaBank does not maintain activities and/or connections with any entity on an EU, UN, OFAC SDN or HKHMT sanctions lists, without respect to sector or country. With respect to individuals or entities in Iran, Sudan, North Korea, Syria and South Sudan, the bank maintains as policy that all operations are prohibited, without respect to sector or connections with the government. In limited cases in which the bank may have had a previous relationship with an entity or individual in one of these countries, that individual or entity is in a formal "work out" process with the bank (or has completed the process). If the bank suspects that the individual or entity was involved in a sanctioned commercial activity, the "work out" process is performed with the full knowledge of the relevant regulator. Operations in Cuba cannot be in US dollars or with a US nexus, including US goods. OFAC general licenses are considered on a case by case basis. Operations in Russia, Crimea / Sevastopol regions of Ukraine are conducted in-line with the relevant sanctions programs. All operations in these countries are considered high risk and subject to review of the Sanctions Office prior to their execution.		
9.	Is your institution or institution group involved in the maintenance or expansion of oil and gas production/import, nuclear program, weapons capability, or dual usage goods or equipment that may be used in those sectors for Sanctioned Jurisdictions or any Russian state owned entity?	☐	☒
	If "YES", please elaborate including specific types of investments, transactions or activities and % of total revenues and/or assets that these investments, transactions or activities represent for your company or company group in Sanctioned Jurisdictions or any Russian state owned entity.		
10.	Is the institution owned or controlled[3] by a sanctions target?	☐	☒
	If "YES" to 10, please provide details:		

[2] **"Sanctions target"** refers to individuals or entities that have economic sanctions imposed on them by the United Nations Security Council, European Union or any of its Member States and/or the U.S. Department of the Treasury's Office of Foreign Assets Control ("OFAC"), or other government authorities.

[3] **"Owned or controlled by a sanctions target"** is inclusive of situations where a sanctions target has: (1) 50% or greater ownership interest; (2) board seats; (3) voting rights; and/or (4) veto authority in the prospect; or is acting as the Chief Executive Officer ("CEO"), Chairman of the Board, or equivalent executive leadership of the prospect.

"**Sanctions**" refers to those measures implemented by the United Nations, European Union or any of its Member States and/or U.S. Department of the Treasury's Office of Foreign Assets Control ("OFAC") or other government bodies worldwide designed to freeze assets or broadly prohibit dealings with designated parties and/or countries engaged in various types of illicit activity.

General

Do the responses provided in the sections of this statement apply to the following entities:

Parent	Yes ☒	No ☐	N/A ☐
Head Office & domestic branches	Yes ☒	No ☐	N/A ☐
Domestic subsidiaries	Yes ☒	No ☐	N/A ☐
Foreign branches	Yes ☒	No ☐	N/A ☐
Foreign subsidiaries	Yes ☒	No ☐	N/A ☐

Comments

If you wish to state any relevant fact or clarify any matter regarding any of your answers to this questionnaire, please do so here

Confirmation and Authorisation

I confirm that in completing and signing this form, I am authorized to provide the above responses on behalf of the FI.

Name: Carlos López Agudo

Position: Chief Compliance Officer

Address: Avenida Diagonal 621, (08028) Barcelona, Spain

E-mail: prevenciondeblanqueo_int@caixabank.com

Signature:

Institution Stamp

Date:
05/04/2017
(dd/mm/aaaa)

Thank you very much for your cooperation

Important:

Also, please inform us in writing as soon as possible of any changes to the data that you have entered on this questionnaire.

CaixaBank, S.A./ Anti-Money Laundering & Sanctions Department (UPBC-9888)
prevenciondeblanqueo_int@caixabank.com
Avda. Diagonal, 621 (08028), Barcelona (Spain)