

Financial Institution Name:	TRAVELEX BANCO DE CAMBIO S.A.
Location (Country) :	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.

Full Legal (Registered) Address Full Primary Business Address (if different from above)	TRAVELEX BANCO DE CAMBIO S.A. Not applicable Av. Engenheiro Luis Carlos Berrini, 105, 5th floor, Building Berrini One - Zipcode: 04571-010 - São Paulo - SP - Brazil
Append a list of foreign branches which are covered by this questionnaire Full Legal (Registered) Address Full Primary Business Address (if different from above)	Not applicable Av. Engenheiro Luis Carlos Berrini, 105, 5th floor, Building Berrini One - Zipcode: 04571-010 - São Paulo - SP -
Append a list of foreign branches which are covered by this questionnaire Full Legal (Registered) Address Full Primary Business Address (if different from above)	Not applicable Av. Engenheiro Luis Carlos Berrini, 105, 5th floor, Building Berrini One - Zipcode: 04571-010 - São Paulo - SP -
Full Legal (Registered) Address Full Primary Business Address (if different from above)	Av. Engenheiro Luis Carlos Berrini, 105, 5th floor, Building Berrini One - Zipcode: 04571-010 - São Paulo - SP -
Full Primary Business Address (if different from	
above)	
	Not applicable
Date of Entity incorporation/ establishment	11th of March, 2010
Select type of ownership and append an ownership chart if available	
Publicly Traded (25% of shares publicly traded)	No
f Y, indicate the exchange traded on and ticker symbol	N/A
Member Owned/ Mutual	No
Government or State Owned by 25% or more	No
Privately Owned	Yes
f Y, provide details of shareholders or ultimate beneficial owners with a holding of 10% or more	The final owner shareholder is Travelex do Brasil Holding Financeira LTDA, which owns 100% of the company, with id CNPJ 13.536.649/0001-73.
% of the Entity's total shares composed of bearer shares	0%
Does the Entity, or any of its branches, operate under an Offshore Banking License (OBL)?	No
f Y, provide the name of the relevant branch/es which operate under an OBL	N/A
Name of primary financial regulator /	
	Member Owned/ Mutual Government or State Owned by 25% or more Privately Owned Y, provide details of shareholders or ultimate eneficial owners with a holding of 10% or more of the Entity's total shares composed of earer shares Ooes the Entity, or any of its branches, operate ander an Offshore Banking License (OBL)? Y, provide the name of the relevant branch/es which operate under an OBL

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10	Provide Legal Entity Identifier (LEI) if available	549300ZIQFP7BVD4RG03
11	Provide the full legal name of the ultimate parent (if different from the Entity completing the DDQ)	Travelex Topco Limited
12	Jurisdiction of licensing authority and regulator of ultimate parent	Financial Conduct Authority - FCA
13	Select the business areas applicable to the Entity	
13 a	Retail Banking	No
13 b	Private Banking / Wealth Management	No
13 с	Commercial Banking	No
13 d	Transactional Banking	Yes
13 e	Investment Banking	No
13 f	Financial Markets Trading	No
13 g	Securities Services / Custody	No
13 h	Broker / Dealer	Yes
13 i	Multilateral Development Bank	No
13 ј	Other	
14	means customers primarily resident in a different jurisdiction to the location where bank	No
14 a	If Y, provide the top five countries where the non-resident customers are located.	N/A
15	Select the closest value:	
15 a	Number of employees	201-500
15 b	Total Assets	Between \$100 and \$500 million
16	Confirm that all responses provided in the above Section ENTITY & OWNERSHIP are representative of all the LE's branches	Yes
16 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	N/A
16 b	If appropriate, provide any additional information / context to the answers in this section.	N/A

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

3. AML	, CTF & SANCTIONS PROGRAMME	
19	Does the Entity have a programme that sets	
	minimum AML, CTF and Sanctions standards	
	regarding the following components:	
19 a	Appointed Officer with sufficient	Yes
	experience/expertise	
19 b	Cash Reporting	
	January Comming	Yes
40 -	CDD	
19 с	CDD	Yes
19 d	EDD	
		Yes
19 e	Beneficial Ownership	
1.3 0	Beneficial Ownership	Yes
	<u> </u>	
19 f	Independent Testing	Yes
19 g	Periodic Review	
		Yes
19 h	Policies and Procedures	
19 11	Policies and Procedures	Yes
19 i	Risk Assessment	Vac
		Yes
19 j	Sanctions	
1.2,		Yes
40.1	DED Owner's	
19 k	PEP Screening	Yes
19 I	Adverse Information Screening	
		Yes
10 m	Cupricious Activity Poporting	
19 m	Suspicious Activity Reporting	Yes
19 n	Training and Education	Voe
		Yes
19 o	Transaction Monitoring	
	Transaction Monitoring	Yes
20	How many full time employees are in the	
	Entity's AML, CTF & Sanctions Compliance	51+
	Department?	
21	Is the Entity's AML, CTF & Sanctions policy	
I	approved at least annually by the Board or	Yes
		i les
	equivalent Senior Management Committee?	
22	Does the Board or equivalent Senior	
	Management Committee receive regular	Monthly
	reporting on the status of the AML, CTF &	
	Sanctions programme?	
23	Does the Entity use third parties to carry out	
		No.
	any components of its AML, CTF & Sanctions	No
	programme?	
23 a	If Y, provide further details	
		N/A
24	Confirm that all responses provided in the	
	above Section AML, CTF & SANCTIONS	Voc
	Programme are representative of all the LE's	Yes
	branches	
24 a	If N, clarify which questions the difference/s	
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	relate to and the branch/es that this applies to.	N/A
24 b	If appropriate, provide any additional	
5	information / context to the answers in this	
		N/A
	section.	
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donations and political contributions 35 e Changes in business activities that may Ves	35 d	_ ·	
35 e Changes in business activities that may			Yes
\mathbf{I}			
1	35 e	1 7	Yes
materially increase the Entity's corruption risk			
Does the Entity's internal audit function or other	36	1	
independent third party cover ABC Policies and Yes			Yes
	Ī	Procedures?	

37	Does the Entity provide mandatory ABC training to:	
37 a	Board and senior Committee Management	Yes
37 b	1st Line of Defence	Yes
37 с	2nd Line of Defence	Yes
37 d	3rd Line of Defence	Yes
37 e	3rd parties to which specific compliance activities subject to ABC risk have been outsourced	No
37 f	Non-employed workers as appropriate (contractors/consultants)	Yes
38	Does the Entity provide ABC training that is targeted to specific roles, responsibilities and activities?	Yes
39	Confirm that all responses provided in the above Section Anti Bribery & Corruption are representative of all the LE's branches	Yes
39 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	N/A
39 b	If appropriate, provide any additional information / context to the answers in this section.	Question 37e : There are no outsorced compliance activities subject to ABC risk.

	CTF & SANCTIONS POLICIES & PROCE	DURES
40	Has the Entity documented policies and	
	procedures consistent with applicable AML, CTF & Sanctions regulations and requirements	
	to reasonably prevent, detect and report:	
40 a	Money laundering	Yes
40 b	Terrorist financing	Yes
40 с	Sanctions violations	Yes
41	Are the Entity's policies and procedures updated at least annually?	Yes
42	Are the Entity's policies and procedures gapped against/compared to:	
42 a	US Standards	Yes
42 a1	If Y, does the Entity retain a record of the results?	Yes
42 b	EU Standards	Yes
42 b1	If Y, does the Entity retain a record of the results?	Yes
43	Does the Entity have policies and procedures that:	
43 a	Prohibit the opening and keeping of anonymous and fictitious named accounts	Yes
43 b	Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs	Yes
43 c	Prohibit dealing with other entities that provide banking services to unlicensed banks	Yes
43 d	Prohibit accounts/relationships with shell banks	Yes
43 e	Prohibit dealing with another entity that provides services to shell banks	Yes
43 f	Prohibit opening and keeping of accounts for Section 311 designated entities	Yes
43 g	Prohibit opening and keeping of accounts for any of unlicensed/unregulated remittance	
	agents, exchanges houses, casa de cambio,	Yes
43 h	bureaux de change or money transfer agents Assess the risks of relationships with domestic	
	and foreign PEPs, including their family and close associates	Yes
43 i	Define escalation processes for financial crime risk issues	Yes
43 j		Yes
12 1	to financial crime risk	
43 k	Specify how potentially suspicious activity identified by employees is to be escalated and investigated	Yes
43 I	Outline the processes regarding screening for sanctions, PEPs and negative media	Yes
43 m	Outline the processes for the maintenance of internal "watchlists"	Yes
44	Has the Entity defined a risk tolerance	
	statement or similar document which defines a risk boundary around their business?	Yes
45	Does the Entity have a record retention procedures that comply with applicable laws?	Yes
45 a	If Y what is the retention period?	5 years or more
46	Confirm that all responses provided in the	
	above Section POLICIES & PROCEDURES are representative of all the LE's branches	Yes
46 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	N/A
46 b	If appropriate, provide any additional information / context to the answers in this section.	
46 b	information / context to the answers in this	

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

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

7 KYC	C, CDD and EDD	
54		
54	Does the Entity verify the identity of the customer?	Yes
55	Do the Entity's policies and procedures set out	
	when CDD must be completed, e.g. at the time	Yes
	of onboarding or within 30 days	
56	Which of the following does the Entity gather	
	and retain when conducting CDD? Select all	
	that apply:	
56 a	Ownership structure	Yes
56 b	Customer identification	Yes
56 с	Expected activity	Yes
56 d	Nature of business/employment	Yes
56 e	Product usage	Yes
56 f	Purpose and nature of relationship	Yes
56 g	Source of funds	Yes
56 h	Source of wealth	Yes
57	Are each of the following identified:	
57 a	Ultimate beneficial ownership	Yes
57 a1	Are ultimate beneficial owners verified?	Yes
57 b	Authorised signatories (where applicable)	Yes
57 c	Key controllers	Yes
57 d	Other relevant parties	
58	What is the Entity's minimum (lowest) threshold	
	applied to beneficial ownership identification?	25%
59	Does the due diligence process result in	
	customers receiving a risk classification?	Yes
	Tarana i a a a a a a a a a a a a a a a a a	

	Turk to the transfer of the tr	
60	If Y, what factors/criteria are used to determine the customer's risk classification? Select all that	
	apply:	
60 a	Product Usage	Yes
60 b	Geography	Yes
60 c	Business Type/Industry	Yes
60 d	Legal Entity type	Yes
60 e	Adverse Information	Yes
60 f	Other (specify)	
61	Does the Entity have a risk based approach to	
	screening customers for adverse media/negative news?	Yes
62	If Y, is this at:	
62 a	Onboarding	Yes
62 b	KYC renewal	Yes
62 c	Trigger event	Yes
63	What is the method used by the Entity to screen for adverse media / negative news?	Automated
64	Does the Entity have a risk based approach to	
	screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?	Yes
65	If Y, is this at:	
65 a	Onboarding	Yes
65 b	KYC renewal	Yes
65 с	Trigger event	Yes
66	What is the method used by the Entity to screen PEPs?	Automated
67	Does the Entity have policies, procedures and	
	processes to review and escalate potential matches from screening customers and	Yes
	connected parties to determine whether they are PEPs or controlled by PEPs?	
68	Does the Entity have a process to review and update customer information based on:	
68 a	KYC renewal	Yes
68 b	Trigger event	Yes
69	Does the Entity maintain and report metrics on current and past periodic or trigger event due	Yes
	diligence reviews?	100

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

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

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

10. SAI	NCTIONS	
86	Does the Entity have a Sanctions Policy	
	approved by management regarding	
	compliance with constians law applicable to the	
	Entity, including with respect its business	Yes
	conducted with, or through accounts held at	
	foreign financial institutions?	
87	Does the Entity have policies, procedures, or	
	other controls reasonably designed to prevent	
	the use of another entity's accounts or services	
	in a manner causing the other entity to violate	Yes
	sanctions prohibitions applicable to the other	
	entity (including prohibitions within the other	
	entity's local jurisdiction)?	
88	Does the Entity have policies, procedures or	
	other controls reasonably designed to prohibit	
	and/or detect actions taken to evade applicable	
	· · · · · · · · · · · · · · · · · · ·	Yes
	resubmission and/or masking, of sanctions	
	relevant information in cross border	
	transactions?	
89	Does the Entity screen its customers, including	
	beneficial ownership information collected by	Yes
	the Entity, during onboarding and regularly	
	thereafter against Sanctions Lists?	
90	What is the method used by the Entity?	Automated
		Automateu
91	Does the Entity screen all sanctions relevant	
	data, including at a minimum, entity and	Yes
	location information, contained in cross border	
	transactions against Sanctions Lists?	
92	What is the method used by the Entity?	Automated
		Automateu
93	Select the Sanctions Lists used by the Entity in	
	its sanctions screening processes:	
93 a	Consolidated United Nations Security Council	Used for screening customers and beneficial owners and for filtering transactional data
	Sanctions List (UN)	Osed for screening customers and beneficial owners and for intering transactional data
93 b	United States Department of the Treasury's	Used for screening customers and beneficial owners and for filtering transactional data
	Office of Foreign Assets Control (OFAC)	See for screening customers and beneficial owners and for intering transactional data
93 с	Office of Financial Sanctions Implementation	Head for agreening quotomers and handicial augusts and for filtering transactional data
	HMT (OFSI)	Used for screening customers and beneficial owners and for filtering transactional data
93 d	European Union Consolidated List (EU)	
		Used for screening customers and beneficial owners and for filtering transactional data
93 e	Lists maintained by other G7 member countries	
	,	Used for screening customers and beneficial owners and for filtering transactional data
93 f	Other (specify)	
	, , , , , , , , , , , , , , , , , , , ,	
		Internal List and Local Restrict List (Portal da Transparencia, IBAMA, Ministerio do Trabalho etc)
94	Question removed	
	Quodion formovou	
95	When regulatory authorities make updates to	
	their Sanctions list, how many business days	
	before the entity updates their active manual	
	and/or automated screening systems against:	
95 a	Customer Data	
	Castomor Bata	
		Same day to 2 business days
OF L	Transactions	
95 b	Transactions	
		Same day to 2 business days

96	Does the Entity have a physical presence, e.g., branches, subsidiaries, or representative offices located in countries/regions against which UN, OFAC, OFSI, EU and G7 member countries have enacted comprehensive jurisdiction-based Sanctions?	
97	Confirm that all responses provided in the	Yes
97 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
97 b	If appropriate, provide any additional information / context to the answers in this section.	

	AINING & EDUCATION	
98	Does the Entity provide mandatory training,	
	which includes :	
98 a	Identification and reporting of transactions to	Yes
	government authorities	
98 b	Examples of different forms of money	
	laundering, terrorist financing and sanctions	Yes
	violations relevant for the types of products and	
98 c	Internal policies for controlling money	
30 0	laundering, terrorist financing and sanctions	Yes
	violations	
98 d	New issues that occur in the market, e.g.,	
30 u	significant regulatory actions or new regulations	Yes
98 e	Conduct and Culture	
		Yes
99	Is the above mandatory training provided to:	
99 a	Board and Senior Committee Management	Yes
		res
99 b	1st Line of Defence	Yes
99 с	2nd Line of Defence	Yes
00.1	(D)	
99 d	3rd Line of Defence	Yes
99 e	3rd parties to which specific FCC activities have	
	been outsourced	Not Applicable
99 f	Non-employed workers	
	(contractors/consultants)	No
100	Does the Entity provide AML, CTF & Sanctions	
	training that is targeted to specific roles,	Yes
	responsibilities and high risk products, services	res
	and activities?	
101	Does the Entity provide customised training for	Yes
	AML, CTF and Sanctions staff?	
102	Confirm that all responses provided in the	
	above Section TRAINING & EDUCATION are	Yes
400	representative of all the LE's branches	
102 a	If N, clarify which questions the difference/s	
	relate to and the branch/es that this applies to.	
102 b	If appropriate, provide any additional	
1	information / context to the answers in this	
	section.	Question 99e : There are no outsorced compliance activities subject .
102 b	information / context to the answers in this	Question 99e : There are no outsorced compliance activities subject .

12. QU	2. QUALITY ASSURANCE /COMPLIANCE TESTING		
103	Are the Entity's KYC processes and documents subject to quality assurance testing?	Yes	
104	Does the Entity have a program wide risk based Compliance Testing process (separate to the independent Audit function)?	Yes	
105	Confirm that all responses provided in the above Section QUALITY ASSURANCE / COMPLIANCE TESTING are representative of all the LE's branches	Yes	
105 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.		
105 b	If appropriate, provide any additional information / context to the answers in this section.		

13. AU	3. AUDIT		
106	In addition to inspections by the government		
	supervisors/regulators, does the Entity have an		
	internal audit function, a testing function or		
	other independent third party, or both, that	Yes	
	assesses FCC AML, CTF and Sanctions		
	policies and practices on a regular basis?		
107	How often is the Entity audited on its AML, CTF		
'''	& Sanctions programme by the following:		
107 a	Internal Audit Department		
107 a	Internal Addit Department	Yearly	
107 b	External Third Party		
ווטי ט	External fillio Party	Yearly	
400	Dear the internal qualit for ation on other		
108	Does the internal audit function or other		
	independent third party cover the following		
	areas:		
108 a	AML, CTF & Sanctions policy and procedures	Yes	
108 b	KYC / CDD / EDD and underlying	Yes	
	methodologies	165	
108 c	Transaction Monitoring	Voc	
	_	Yes	
108 d	Transaction Screening including for sanctions		
		Yes	
108 e	Name Screening & List Management		
	g org	Yes	
108 f	Training & Education		
	Training & Education	Yes	
108 g	Technology		
100 9	recimology	Yes	
108 h	Governance		
100 11	Governance	Yes	
400 :	Deporting /Matrice 9 Management Information		
108 i	Reporting/Metrics & Management Information	Yes	
100.1	0 11 1 5 5 5		
108 j	Suspicious Activity Filing	Yes	
108 k	Enterprise Wide Risk Assessment	Yes	
108 I	Other (specify)		
109	Are adverse findings from internal & external		
	audit tracked to completion and assessed for	Yes	
	adequacy and completeness?		
110	Confirm that all responses provided in the		
'''	above section, AUDIT are representative of all	Yes	
	the LE's branches		
110 0			
110 a	If N, clarify which questions the difference/s		
	relate to and the branch/es that this applies to.		
110 b	If appropriate, provide any additional		
	information / context to the answers in this		
	section.		

Declaration Statement

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

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

Travelex Banco de Câmbio 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 thisWolfsberg CBDDQ will be kept current and will be updated no less frequently than on an annual basis.

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

Joao Manuel Campanelli Freitas

(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 nstitution.

Celia Regina Pizzi

(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.

João Manuel Campanelli Freitas8/16/2022 (Signature & Date)

Celia Pizzi

8/16/2022 (Signature & Date)