**Name of Institution**: Abanca Corporación Bancaria, S. A.

**Full Address**: c/ Cantón Claudino Pita, nº 2, Betanzos, 15300 - A Coruña (Spain)

**Place of Registration**: Spain

**Outline of History:**

Abanca Corporación Bancaria S. A. (Abanca) is a financial institution incorporated according to the laws of Spain and subject to the supervision of the Bank of Spain. Abanca was created by the merger between Banco Etcheverria S.A. (the oldest bank in Spain) and NCG Banco S.A. (created by the spin-off in its favor of all the assets, liabilities, rights, obligations and patrimony affected to the financial activity of “Caixa de Aforros de Galicia, Vigo, Ourense and Pontevedra”). Abanca provides investment and universal banking services to its customers and is registered in the Bank of Spain’s Banks and Bankers Registry with the code 2080 and its Spanish fiscal identification is A70302039.

For the performance of its activity, at 31 March 2020 the Bank has 529 operating branches in the Autonomous Region of Galicia; 182 branches across the rest of Spain; 44 in Portugal; 1 in Switzerland and 1 in United States, as well as representative offices in Brazil, Mexico, Panama, Venezuela, Switzerland, Germany, Great Britain and France.

**Banking License issued by**: Banco de España (www.bde.es)

**Number**: 2080

**Customer (Kyc) Policy:**

Abanca has an anti-money laundering program (Anti-Money Laundering Manual – updated annually, last in February, 2020) that establish the policies, procedures and internal controls designed to comply with applicable law.

In the evaluation of the risk of a potential customer it should be taken into account the previous relations with the customer, the nature of the solicited products and services, the source of funds, economic activity and country of nationality or residence.
Some potential customers are not accepted: those who refuse to provide the required information or documentation, casinos without official authorization, shell banks and people possibly related to criminal activities.

Some potential customers of high risk (PEPs, etc) need the special authorization of the “Comité de Prevención de Blanqueo” – “Anti-Money Laundering Committee” to establish new business relationships.

In case of legal personas, Abanca requires original official documentation to confirm the, legal form, the ultimate beneficial owners, address, directors, the corporate bylaws and the powers of attorney...etc Neither anonymous accounts or coded accounts are allowed to be clients.

In case of natural persons, Abanca requires also requires official documentation like (national ID card, passport or valid document, income statement, payslip, tax declaration, employment contract or valid document).

**Detection Method for Money Laundering:**

Internal training is designed in Abanca to facilitate employees in close contact with customers or operations the information required to detect potentially suspicious transactions.

Abanca uses an specific AML informatics application (developed by Deloitte and Management Solutions for the Spanish financial system) to maintain a permanent monitoring of customer’s activity and to detect possible structured operations and other risk operations. Reviewing focus is located in customer’s risk scoring, transactions with high risk jurisdictions or residents in those countries, cash transactions and potentially structured operations.

**Internal Procedure to prevent the risk of Money Laundering:**

Abanca has established general principles to avoid money laundering or terrorist financing by means of Abanca’s products or services. Strict internal regulation is applicable to branches in all countries in which Abanca is present (Spain, Portugal, Switzerland and USA).

To fulfil this objective internal control is designed to assure:

**Client acceptance.**

Clients must be properly identified and reasonable measures are adopted to confirm the legitimacy of their source of funds and professional or business activity. Customers are classified by risk level to graduate due diligence applied for client acceptance.
Practices for walk-in clients require their identification, close monitoring and an analysis of operations over a minimum threshold.

**Detect unusual or suspicious activities.**

Unusual or suspicious activities can be identified through:

- Monitoring of transactions.
- Client contacts.
- Third parties information.

**Control responsibilities.**

Written control policy defines for each country, according to the local regulation, standard control procedures to be undertaken by the various “control layers” (branches, centralised departments, Compliance, Internal Audit).

**Education, training and Information.**

Abanca has established a training program on Anti-money laundering and terrorism financing (AML/CFT) for employees who have contact with the clients and for employees from other sensible areas. Regular training includes how to identify and follow up unusual or suspicious activities.

Managers and employees are informed about any change in anti-money laundering laws and regulations.

All new employees are provided with training and guidelines on anti-money laundering procedures.

**Record keeping obligations.**

The documentation (customer identification, operations and other documents require under the customer diligence measures) must be kept for a minimum period of ten years.
Anti-money-laundering structure.

Abanca has established independent departments and Internal Committees responsible for anti-money laundering policies and procedures.

Independent Assessment of AML/CFT Policies and Procedures.

The adequacy and effectiveness of AML policies and procedures are tested annually by renowned independent experts. This annual review is also performed by Abanca’s Internal Audit.

Abanca Corporación Bancaria, S. A. (trade name //ABANCA )
https://www.abancacorporacionbancaria.com/

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A Coruña, July, 10th, 2020

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<th>Name</th>
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<tbody>
<tr>
<td>Luis Florencio Santa- María Pérez</td>
<td>Director of Governance, Compliance and AML/CTF</td>
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