



## **GENERAL DECLARATION ON THE POLICIES FOR THE PREVENTION OF MONEY LAUNDERING AND TERRORIST FINANCING.**

Banco de Sabadell, S.A. is a commercial bank registered in the Bank of Spain's registry of banks and bankers.

Banco de Sabadell, S.A. and all the companies forming its Group have always applied a policy of strict compliance with the regulations above and beyond the legal standards.

Institutional, economic and financial information on the Banco Sabadell group is available via its website [www.grupbancosabadell.com](http://www.grupbancosabadell.com). It makes available all the information on the Group, number of employees and branches, chief lines of business, members of the Board of Directors and General Management, chief shareholders, the structure and composition of the Banco Sabadell group worldwide and the Wolfsberg questionnaire.

Additional information can be found on the Bankers Almanac and KYC Registry from the Swift Portal, which contains the banking license and other relevant documents concerning our Group.

Spain, as a member state of FATF/GAFI, has national legislation in the matter of money laundering and terrorism financing as a result, amongst others, of the transposition of the European Union Directives via Law 10/2010 dated April 28<sup>th</sup>, Royal Decree-Law 304/2014, dated May 5<sup>th</sup> and Royal Decree-Law 7/2021 dated April 27<sup>th</sup>.

Regarding the Group's activity, internal structure and activities in the Prevention of Money Laundering and Terrorism Financing please note the following:

- The global policy of the Banco Sabadell group consists of strictly complying with all the legal requirements in all the countries in which it operates and it is actively committed to the efforts carried out concerning anti-money laundering and counter terrorism financing.
- The chief elements of the policies on the prevention of money laundering and financing of terrorism in the Group are listed below:
  - a. Existence of the Group's Customer Acceptance Policy.
  - b. Full identification of customers (and full identification of the ultimate beneficial owner for legal persons) and their economic or professional activities going beyond the mere submission of documents on a risk based approach. With regard to non-face-to-face customers; it is strictly limited to natural person's residents in some specific jurisdictions who also had signed the Hague Convention. The procedure requires additional documentation (apostilled by Hague), a specific KYC as well as previous Compliance approval.
  - c. Anonymous accounts are not allowed.
  - d. Specific procedures to identify politically exposed persons (PEP's) or their direct relatives or close collaborators (RCA). PEP's and RCA's are considered high risk customers, are annually reviewed (with mandatory Compliance approval) and screened on a daily basis.

- e. Existence of an Acceptance Policy for banks with which a correspondence agreement is established.
- f. No business relations are established with shell banks.
- g. Online detection system of natural and legal persons included in international sanctions lists.
- h. Document digitalization system to keep records of all the proofs of identity and economic activities provided by our clients.
- i. Specific software to detect, monitor and analyse suspicious operations and, if applicable, report to the Spanish Financial Intelligence Unit (SEPBLAC).
- j. Internal standards and procedures on the Prevention of Money Laundering and Financing of Terrorism.
- k. Internal standards and procedures in order to detect and analyse operations that could be related to sanctioned countries before they are executed. Banco Sabadell group is committed to comply with all restrictive measures adopted by the international community, UN, EU and OFAC. A specialized team analyses these operations in order to check that there's no relation to a sanctioned person or entity, nor the import or the export of the products (or even double use goods) is prohibited, and they fully comply with sanctions regulations. Culture of prevention and knowledge of the customer extended to all Group employees via specific training sessions which are regularly updated.
- l. Regular supervision of the Group's Internal Audit.
- m. Annual audit carried out by an external, independent expert who assesses the effectiveness, adequacy and compliance with the systems and procedures for the Prevention of Money Laundering and Financing of Terrorism.
- n. The Banco Sabadell group has an Internal Control Body comprising senior executives, a Central Unit and a network of Compliance Correspondents in the various overseas affiliates and branches of the Group. This internal Organization ensures the uniform fulfilment of the Group's Compliance policies.

For any matter related to the content of this document and other questions concerning the Compliance function, please contact:

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