

## **Declaration on the Prevention of Money Laundering and Financing of Terrorism**

### **1. Institutional information**

- Name: Banco Comercial e de Investimentos, S.A. (BCI)
- Address: Av. 25 de Setembro, n.º 4, Maputo – Mozambique
- SWIFT Code: CGDIMZMA
- Legal status: Public limited company
- Equity structure:

Shareholder	%
Caixa Participações SPGS, S.A (CGD Group)	51.00%
Banco BPI, S.A. (BPI Group)	35.67%
Caixa Geral de Depósitos S.A (CGD Group)	10.51%
BCI, S.A (Treasury shares)	2.78%
Individual shareholders (mainly BCI employees)	0.04%

- Supervisory body: Bank of Mozambique
- Credit institution code: 8
- External auditors: PWC
- Contact: Compliance Officer Address: Av. 25 de Setembro, 4  
Maputo – Mozambique  
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### **2. Relevant national and international standards**

#### **International standards and recommendations:**

- 40 Recommendations from FATF/GAFI on money laundering and the financing of terrorism, produced in 1990 and updated in 1996, 2003, 2004 and 2012. The last update includes the 9 specific recommendations on the financing of terrorism (produced in 2001 and updated in 2004) which comprise an advanced, complete and consistent framework of anti-money laundering and financing of terrorism measures.

- Directive (EU) 2015/849 of the European Council and of the Parliament of 20 May, on Preventing the use of the financial system for the purposes of money laundering or financing of terrorism, repealing Directives 2005/60/EC and 2006/70/EC.
- Regulation (EC) 1889/2005 of the European Council and of the Parliament of 26 October on controls of cash entering or leaving the Community.
- Regulation (EU) 2015/847 of the European Council and of the Parliament of 20 May on information accompanying transfers of funds, repealing Regulation (EC) 1781/2006.

**National legislation and regulation:**

- **Law 14/2023, of August 28** – Law to prevent and Combat Money Laundering and Financing of Terrorism and Weapons of Mass Destruction;
- **Decree 53/2023 of August 31** – approving the regulation of Law 14/2023 of 28 August.
- **Notice 05/GBM/2022 of November 17** – Approves the Guidelines on the Prevention and Repression of Money Laundering and Financing of Terrorism.
- **Law 15/2023, of August 28** – Establishes the Legal Regime for the Prevention, Repression and Combat of Terrorism and the Proliferation of Weapons of Mass Destruction.
- **Law 2/2018 of June 19 (revoked Law 14/2007)** – Law that creates the Financial Intelligence Unit (GIFiM).
- **Decree 49/2019 of June 7** – Approves the organic status of the Financial Intelligence Unit (GIFiM).

**3. Anti-money laundering and countering the financing of terrorism (AML/CFT) preventative measures in BCI**

BCI has adopted internal policies and procedures to ensure compliance with national AML/CFT legislation.

BCI has an AML/CFT programme that identifies, mitigates and manages the risk of money laundering and financing of terrorism. The programme has been approved by its board of directors and it is being implemented in all of its business units.

**BCI applies the following policies and procedures:**

**Knowledge and monitoring of customers.** BCI has internal policies and procedures to ensure compliance with the duty to identify its customers and monitors its customers' transactions which are regularly filtered and checked against relevant lists for the identification of sanctioned customers and PEPs.

**Politically exposed persons (PEPs).** BCI takes special care to monitor transactions whose customers or Ultimate Beneficial Owner are PEPs.

**Anonymous or numbered accounts.** BCI does not provide its customers with anonymous or numbered accounts.

**Conservation of documents.** Documents relative to the identification of customers, as well as receipts for transactions, are kept for a period of 10 years following the end of the business relationship.

**Monitoring of suspicious operations.** Carried out by BCI employees on a risk-based approach.

**Communication of suspicious operations.** BCI has internal policies and procedures for complying with its legal obligation to notify the competent entities (Public Prosecutors' Office, Mozambique Office of Financial Information and Bank of Mozambique) of any operations suspected of comprising crimes of money laundering or the financing of terrorism.

**Communication of relevant banking transactions in accounts.** BCI reports single and multiple transactions to Gabinete de Informação Financeira de Moçambique (GIFiM) as follows:

- i. Cash transactions of two hundred and fifty thousand meticaïs (MZN 250,000.00) or more, or equivalent;
- ii. All electronic funds transfer transactions of seven hundred and fifty thousand meticaïs (MZN 750,000.00) or more, or equivalent.

The details of the transfer operations such as the name of the payer and payee and address are checked against international lists. BCI has implemented internal policies and procedures to comply with the applicable legislation.

**Training.** AML/CFT training on the detection and communication process for suspicious operations is given in several of the bank's units, particularly its branch office network.

**Employee oversight.** BCI has implemented processes to certify the identity, honesty and integrity of its employees.

**Independent audit and review of compliance.** Internal audit has specific audit programs to assess compliance. The Compliance Office analyses compliance with all AML/CFT-related operating policies and procedures. The audit and compliance programs have been approved by the Board of Directors.

**Correspondent banks.** BCI has implemented risk-based diligence procedures that include knowledge of its correspondents' type of business, their operating licenses, quality of their management, ownership and effective control and AML/CFT policies. It also continuously oversees its correspondents' accounts. The entering into correspondent banking relationships, notwithstanding the level of risk, must be approved by a resolution of the executive committee subject to the prior opinion of the compliance office.

**Shell banks.** BCI does not enter into nor does it maintain business relationships with shell banks as indicated in Law 14/2023 and defined in the respective glossary.

**Payable-through accounts.** BCI does not provide this type of service.

**Checking transfers against international lists.** BCI has a computerized solution to filter transfers received and sent to be checked against EU, UN, HMT and OFAC lists.

**Sanctions policy.** BCI has implemented a series of policies and procedures to ensure that it does not enter into or maintain any business relationships, nor process operations for/on behalf of persons, entities or countries that have been sanctioned.

**Information on BCI's sanctions policy is available on its website at:** [www.bci.co.mz](http://www.bci.co.mz)

#### **4. Wolfsberg AML questionnaire**

BCI follows the principles set out in the Wolfsberg AML questionnaire on AML/CFT. The Wolfsberg AML questionnaire is available on BCI's website at: [www.bci.co.mz](http://www.bci.co.mz)

#### **5. USA Patriot Act certificate**

According to the Uniting and Strengthening America by Providing Appropriate Tools Required to Intercept and Obstruct Terrorism Act 2001 (USA Patriot Act), whenever necessary, BCI may be requested to supply the Certification Regarding Accounts for Foreign Banks document.

The USA Patriot Act Certificate is available on **BCI's website at:** [www.bci.co.mz](http://www.bci.co.mz)

February, 2024

A handwritten signature in black ink, appearing to read "Bento Vilanculo".

**Compliance Officer**

Bento Vilanculo