

**BANCO POPULAR GROUP**

**ANTI-MONEY LAUNDERING AND  
TERRORISM FINANCING COMBAT POLICIES**

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BANCO POPULAR ESPAÑOL, S.A. and its banking subsidiaries (Banco de Andalucía, S.A, Banco Popular Hipotecario, S.A., Popular Banca Privada, S.A. and Bancopopular-e, S.A) as Spanish financial institutions, are governed by the Law 19/1993 of 28 December on certain measures for Prevention of Money Laundering, amended by the Law 19/2003 of 4 July, on the legal framework of capital movements and cross border transactions and on certain preventive measures against money laundering and by the Royal Decree 925/1995 of 9 June amended by the Royal Decree 54/2005 of 21 January. Furthermore, the Law 12/2003 of 21 May on prevention and blocking of terrorism financing compels financial institutions to perform certain obligations on this subject.

Banco Popular Group has implemented measures and proceedings in order to prevent and detect any supposed activity related to money laundering and terrorism financing. Furthermore, these measures are in line with the FATF (*Financial Action Task Force*) Recommendations on Money Laundering, as well as with the European regulations on this subject.

As regards Banco Popular Group's activities, written policies to combat money laundering have been designed and internal procedures and controls have been put into effect to develop those policies. Hence, some main elements of the Group's anti-money laundering policies are referred hereinafter:

- Complete personal identification of customers and knowledge of their activity. Anonymous accounts are not allowed.
- Employees training periodical programmes on money laundering prevention in order to assist them to detect suspicious activities.
- Monitoring and reporting of suspicious activities and transactions to the relevant authorities.
- Keeping of customers' operations and identification documents for at least 6 years.
- Extra preventive measures are currently taken in the event of transactions carried out by customers with natural persons or legal entities, located in tax havens or in non-cooperative countries.

The Money Laundering Prevention Office is responsible for performing the Group's anti-money laundering policies and implementing internal procedures to this end. This Office is likewise responsible for reporting all purportedly money laundering and terrorism financing operations detected by the Group's control internal procedures to the Financial Intelligence Unit (FIU).

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**BANCO POPULAR GROUP**



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