

INSTRUCTIONS MANUAL FOR FILLING OUT THE STATISTICAL INFORMATION FORM RELATED TO THE BANKING INDUSTRY RISK OF MONEY LAUNDERING, THE FINANCING OF TERRORISM AND FINANCING THE PROLIFERATION OF WEAPONS OF MASS DESTRUCTION

The Statistical Information Form required by the Superintendency is for the risk of money laundering, the financing of terrorism and financing the proliferation of weapons of mass destruction, hereinafter referred to AML/CFT/WMD, which is comprised of an Excel file with six (6) calculation sheets, as follows:

1. Affidavit;
2. Structural and Financial information;
3. Customer risk information;
4. Products and services risk information;
5. Distribution channel risk information; and
6. Geographical area risk information.

The information request is to be submitted on a semi-annual basis. The closing dates will be June 30 and December 31 of each year. The information must be submitted to the Superintendency of Banks of Panama on the 31st day of the month following the closing date of each period.

When filling out the information required in the form, please bear in mind the following:

- Fill out only the cells in gray color
- The amounts must be recorded in the local currency (Balboas [B/.]) without periods, commas or currency symbols
- The file structure must not be added to, deleted or modified
- The date format must be DD/MM/YYYY
- The cells requiring quantities must be filled out without periods, commas or text

I. **AFFIDAVIT:**

Legal grounds:

Law 23 dated 27 April 2015

Rule 4-2014

It is of the utmost importance to give warning that the information described herein is legally binding institutionally on the reporting entity and personally on the persons reporting this information to the authority.

In that sense, the Bank hereby certifies that the affidavit and information in the form are true and accurate and authorizes the Superintendency of Banks of Panama to use them for the purposes of monitoring and supervision. This affidavit must state the name and position of the person filling out the document and also the name of the Compliance Officer certifying the truthfulness of the reported information.

1. Report date (DD/MM/YYYY): The date the report is made to this authority. (DD/MM/YYYY format).
2. Report closing date (DD/MM/YYYY): **For one time only** and in order to have information on two (2) different periods, this Statistical Information Form for AML/FT/WMD risk **initially must be submitted for the two semi-annual closing dates of 2016:**

First Report or Document 1. The information report closing date will be **June 30, 2016**. However, for the transactions (Fees, wire transfer transactions, etc.), the **period between January 1 and June 30, 2016** must be considered.

Second Report or Document 2. The information report closing date will be **December 31, 2016**. However, for the transactions (Fees, wire transfer transactions, etc.), the **period between July 1 and December 31, 2016** must be considered.

Subsequently, the reports will be governed by the required reporting dates:

“This information request will be submitted on a semi-annual basis. The closing dates will be June 30 and December 31 of each year. The information must be submitted to the Superintendency of Banks of Panama on the 31st day of the month following the closing date of each period.”

3. Entity name: The name of the entity as recorded in the license granted by this authority.
4. Prepared by: The name and position of the person filling out the document.
5. Compliance Officer Name: The name of the Compliance Officer according to the last notification submitted to the Superintendency.

II. STRUCTURAL AND FINANCIAL INFORMATION OF THE REGULATED ENTITY

A. Regulated entity's general data

1. Compliance Officer's contact telephone: company's telephone number for contacting the Compliance Officer directly.

B. Structural and financial information

1. If the entity is the group's Panamanian parent company: If the bank is the Panamanian parent company of a financial/economic group, please indicate the name of the financial/economic group. If not applicable, indicate N/A

1.1. Regulated affiliates

1.1.1. How many: If the bank is a parent company, indicate the number of regulated affiliates or subsidiaries.

1.1.2. Type of entity(ies): If the bank is a parent company, please list the sectors in which the regulated affiliates or subsidiaries operate.

1.2. Foreign affiliates

1.2.1. How many: If the bank is the parent company and it has affiliates or subsidiaries abroad, please indicate the number of regulated foreign affiliates.

1.2.2. Type of entity(ies): if the bank is a parent company, please list the sectors in which the regulated foreign affiliates or subsidiaries operate.

1.2.3. Country relationship: If the bank is a parent company with affiliates or subsidiaries abroad, please list the countries in which these affiliate are located.

1.3. Unregulated affiliate companies:

1.3.1. How many: If the bank is a parent company with unregulated affiliates or subsidiaries in the country or abroad, please indicate the quantity.

1.3.2. Type of entity(ies): If the bank is a parent company with unregulated affiliates or subsidiaries in the country or abroad, list the sectors in which the unregulated affiliate companies operate.

2. If the entity is part of a financial group (not the parent company): Please specify the name of the parent company to which it belongs. If not applicable, indicate N/A.
3. Total number of employees of the bank: Please indicate the total number of employees dependent on the bank, regardless of the type of relationship (appointed, recruited, etc.)
4. Alternate Compliance Officer Name: In case of the temporary absence of the Compliance Officer, the name of the person that will take over the role and responsibilities of the Compliance Officer.
5. Total number of employees in the Compliance Structure: Number of people working in the AML/CFT/WMD) unit/area.
6. Monitoring tool name: Name of the tool the bank uses in the prevention of ML/CFT/WMD risk.
7. Monitoring tool version: If the previously listed tool has different versions, please list the version the Bank currently uses.
8. Monitoring tool implementation date: (DD/MM/YYYY) Date in which the bank started using the monitoring tool.
9. Date of last update of the monitoring tool: (DD/MM/YYYY) Date of the last update of the monitoring tool.
10. Monitoring tool supplier: If applicable, indicate the name of the monitoring tool supplier.
11. Total red flags generated during the reporting period: The number of red flags generated during the reporting period.
12. Total Suspicious Transaction Reports during the period: Number of STR submitted to the FAU during the reporting period.
13. Cash Transaction Reports (CTR) during the period
 - 13.1. Quantity: Number of CTRs during the period
 - 13.2. Amount: Total value of the cash transaction reports during the reporting period.

C. Information on AML/CFT/WMD Risk Factors

I. CUSTOMER RISK INFORMATION:

The information on the number of clients and the transactional volume – value of deposits received during the period – is required on the types of clients indicated below

1. Customers classified as Individuals
 - 1.1. Total Nationals: Applies to customers holding Panamanian nationality.
 - 1.2. Total Foreigners: Applies to customers holding foreign nationality.
2. [Customers] classified as Legal entities
 - 2.1. Total Nationals: Applies to customers classified as legal entities incorporated in Panama.
 - 2.2. Total Foreigners: Applies to customers classified as legal entities incorporated abroad.
 - 2.3. Bearer share customers: Applies to customers who are legal entities for whom some or all of its shares are issued as bearer shares. This does not include customers whose issued share package consists only of registered shares.
 - 2.4. Customers classified as private interest foundations: Applies to customers identified as private interest foundations.
 - 2.5. Customers classified as nonprofit foundations: Applies to customers identified as nonprofit foundations.
 - 2.6. Customers identified as Not-for-profit Organizations (NPO): Applies to customers identified as Not-for-profit organizations (NPO).
 - 2.7. Customers with contractual relationships with the Government: Applies to customers having contracts with the government.
3. Customers classified as Politically Exposed Persons (PEP)
 - 3.1. Nationals: Applies to customers the bank has classified as Panamanian PEP.

- 3.2. Foreigners: Applies to customers the Bank has classified as Foreign PEP.
4. Other customer classifications
 - 4.1. Customers located in free trade areas: Total number of customers running operations through a free trade area.
 - 4.2. Customers using elevated amounts of money: The top 100 customers using large amounts of money (Deposits).
 - 4.3. Customers using trust funds: Customers with trust agreements, whether or not the Bank acts as trustee.
5. Customers classified by risk by the bank
 - 5.1. High: Applies to customers the Bank has classified as high risk.
 - 5.2. Medium: Applies to customers the Bank has classified as medium risk.
 - 5.3. Low: Applies to customers the Bank has classified as low risk.

2. PRODUCTS AND SERVICES RISK INFORMATION:

Information is required on the products and services risk listed below, the number of customers and the transactional volume (the total loan balance).

List of Loan Products

1. Consumer loans: This variable corresponds to customers having consumer loans and the transactional variable corresponds to the total loan balance on the closing date.
2. Commercial loans: This variable corresponds to customers having commercial loans and the transactional variable corresponds to the total loan balance on the closing date.
3. Mortgages: This variable corresponds to customers having mortgages and the transactional variable corresponds to the total loan balance on the closing date.

4. Back-to-back loans: The back-to-back loans information is for both consumer and commercial loans.
 - 4.1. Deposits and loans in the same bank: This variable corresponds to customers having back-to-back loans for which the deposits and loan are in the same bank; the transactional variable corresponds to the value of the deposits securing the loan.
 - 4.2. Deposits in the bank and loans in another bank: This variable corresponds to customers having back-to-back loans for which the deposits are in the bank and the loan is in another bank; the transactional variable corresponds to the value of the deposits securing the loan.
 - 4.3. Deposits in another bank and loans in the bank: This variable corresponds to customers having back-to-back loans where the deposits are in another bank and the loan is in the bank; the transactional variable is the total value of the loan at the closing of the period.

List of Deposit Products

5. Checking accounts: The number of checking accounts and total deposits received during the period.
6. Savings accounts: The number of savings accounts and total deposits received during the period.
7. Time deposits: The number of time deposit accounts and total deposits received during the period.
8. Encrypted bank accounts: Indicate whether the bank has encrypted accounts or not.
 - 8.1. Checking accounts: The number of encrypted checking accounts and total deposits received during the period.
 - 8.2. Savings accounts: The number of encrypted savings accounts and total deposits received during the period.
 - 8.3. Time deposits: The number of encrypted time deposit accounts and total deposits received during the period.
 - 8.4. Securities: The number of encrypted securities accounts and total deposits received during the period.

8.5. Others: The number of other encrypted product accounts and total deposits received during the period.

8.5.1. If other encrypted products are maintained, list the products that belong to other encrypted products.

List of Services by Risk

9. Private banking: Refers to the total number of private banking customers and total deposits received during the period.

10. Correspondent banking

10.1. Panamanian banks (Deposits): Refers to deposits other domestic banks have in the bank.

10.2. Foreign banks (Deposits): Refers to deposits other foreign banks have in the bank; it is important to consider as foreign entities all those banks that are not Panamanian but hold a general license and foreign equity.

11. Investment funds: Total number of customers having investment funds and total deposits received during the period.

12. Letters of credit: Total number of customers having letters of credit and total commissions for the established period.

13. International wire transfers

13.1. Sent: Volume of international wire transfer operations (number); the transactional variable corresponds to the total value of the wire transfers sent during the established period.

13.2. Received: Volume of international wire transfer operations (number); the transactional variable corresponds to the total value of the wire transfers received during the established period.

14. Purchase/sale of currencies

14.1. Purchase of currencies: Customers purchasing foreign currencies.

14.2. Sale of currencies: Customers selling foreign currencies.

15. Safety Deposit boxes: Number of customers using safety deposit box services.
16. Custodial (property/assets): This service corresponds to the custodial service of assets (third-party management) offered by the bank, if any; the variables consist of total customers and total value of the property/assets held in custody.
17. Credit cards (limit higher than B/.10,000.00): Corresponds to all credit cards with limits equal to or greater than B/.10,000.00; the transactional value corresponds to the total limits established.

3. Information of distribution channels risk:

The information on the number of clients and the total transactional value is required for the distribution channels risks listed below.

1. Automated teller machines: Corresponds to operations conducted only by the Bank's customers through automated teller machines and the total withdrawals made during the period.
2. Internet: Corresponds to operations conducted through the Internet (e-banking or online banking) and the total amount of the debits and credits made during the period.
3. Mobile banking: Corresponds to the operations conducted through mobile phones (smartphones) and the total debits and credits made during the period.
4. Nonbanking correspondents: Corresponds to the operations conducted through nonbanking correspondents and the total debits and credits made during the period.
5. Smart box: Corresponds to the operations conducted through a smart box and the total debits and credits made during the period.

4. Information on geographic zone risk:

The information on the number of customers and the transactional volume – total deposits received during the period – for the following provinces is required:

1. (Panamanian) domestic zone: These variables correspond to the number of customers the Bank has in the branch offices located in these provinces. Additionally, taking into consideration the risk

classification adopted by the Bank, please choose the appropriate risk level (high, medium, low) for each of the national geographic zones listed in 1.1 through 1.10

- 1.1. Province of Bocas del Toro
 - 1.2. Province of Coclé
 - 1.3. Province of Colón
 - 1.4. Province of Chiriquí
 - 1.5. Province of Darién
 - 1.6. Province of Herrera
 - 1.7. Province of Los Santos
 - 1.8. Province of Panamá
 - 1.9. Province of Veraguas
 - 1.10. Province of Panamá Oeste
2. International zone: Corresponds to the domiciliary country declared by the customer.
- 2.1. Jurisdictions subject to United Nations (UN) sanctions: Corresponds to customers domiciled in countries subject to UN sanctions and total deposits received during the period. List the countries.
 - 2.2. Countries listed by the FATF due to control failure: Corresponds to customers domiciled in countries subject to FATF sanctions due to control failures and total deposits received during the period. List the countries.
 - 2.3. Other high-risk countries according to the analysis conducted by the bank: Corresponds to customers domiciled in other countries designated high-risk by the bank but not included in the previous listings and the total deposits received during the period. List the countries.

Please remember that:

1. The information must be submitted digitally in Excel format via e-mail (soporte@superbancos.gob.pa)
2. Any inquiries about this requirement should be submitted via e-mail (soporte@superbancos.gob.pa)