

August 31, 2018
Circular N° SBP-DPC-0074-2018

General Manager

Subject: Information on the Identification of Risk
Factors. Article 40 of Law 23

Dear General Manager:

We wish to inform you hereby that during its work sessions, the Superintendency of Banks has determined it necessary and advisable to automate the submittal of the Identification of Risk Factors form that Circular SBP-DPC-0028-2017 requires to be sent to the Superintendency on a semiannual basis. In this regard, the Superintendency has deemed it convenient to create the Factors Atom - Banks (PB01), Bank General Data on AML (PB02) and the Risk Factor Structure (SB94).

These structures are fundamental to our Anti-Money Laundering, Financing of Terrorism and Financing the Proliferation of Weapons of Mass Destruction Risk Management Methodology as we have verified in our mutual assessment process with GAFILAT. Your cooperation in the submittal of these atoms is therefore most important.

This information must be reported semiannually. 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 by the thirty-first (31st) day of the month following the closing date of each period.

In connection with the above, please find enclosed the following forms:

- Word file: Factor Atom – Banks (PB01)
- Word file: Bank General Data on AML (PB02)
- Excel file: Risk Factor Structure (SB94)

These files provide the requirements for information on the Identification of Risk Factors the bank must use in sending the information beginning in January 2019.

We will be scheduling all banks to attend the orientation training on these structures starting on September 14, 2018.

Additionally, we remind you that the established e-mail for receiving your enquiries is soporte@superbancos.gob.pa

We would greatly appreciate your providing the necessary instructions for the submittal of this information by the deadline established for this purpose.

Best regards,

Ricardo G. Fernandez D.
Superintendent

NM/mddec