

October 1, 2018
Circular N° SBP-DPC-FACT-0091-2018

General Manager

Subject: Self-assessment questionnaire on the
Prevention of Money Laundering, the
Financing of Terrorism and Financing the
Proliferation of Weapons of Mass Destruction

Dear General Manager:

In compliance with the provisions of Article 20 of Law 23 dated 27 April 2015, the Prevention and Control of Illicit Operations Division of the Superintendency of Banks has started a strengthening process for the risk-based supervision methodology. In connection with the above, we are sending two (2) files (in Spanish) to be filled out. The information includes the following:

1. The document called "Self-Assessment Questionnaire for Factoring Entities" is an Excel document with a series of questions that should be answered by the reporting entity with information from 2017. These questions focus on:
 - General data
 - Guidelines, policies, and procedures on AML/FT/WMD
 - Due diligence
 - Suspicious transactions reports
 - Corporate governance
2. "2017 Operational information" (Appendix 2) consists of a series of questions and financial data from the entity.

The enclosed files and documents must be submitted on a flash drive (USB) at the Reception Desk of the Superintendency of Banks located in the ground floor of Banistmo Tower. The USB must be submitted in a sealed envelope to the attention of the "Prevention and Control of Illicit Operations Division (Confidential)," no later than 90 business days from the day following the date of issuance of this Circular.

Should you wish additional information, please feel free to request a meeting through soporte@superbancos.gob.pa, with subject line: "Self-assessment questionnaire for Factoring Entities" and you will be scheduled on a first come, first serve basis between October 8 and 12, 2018.

We would appreciate your providing the necessary instructions to your staff for compliance with this circular.

Best regards,

Ricardo G. Fernandez D.
Superintendent

Enc.: a/s

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