



August 22, 2016
Circular N° SBP-DPC-FINAN-0097-2016

General Manager

Subject: Requirement for information on the
Compliance Manual and Program.
Article 13 of Rule 5-2015 and Circular
N° SBP-DPC-FINAN-0169-2015.

Dear General Manager:

Based on the provisions of Article 39 of Law 23, Article 13 of Rule 5-2015, and Circular N° SBP-DPC-FINAN-0169-2015, in order to clarify inquiries and unify criteria on the guidelines that regulated financial entities must adopt, please be advised of the following:

1. It is required that the Manual, Program, Policies, Procedures, Mechanisms and any other information used by **leasing companies** for the management, control and prevention of Money Laundering and the Financing of Terrorism be sent to the Prevention and Control of Illicit Operations Division of the Superintendency of Banks of Panama.
2. The information required must be submitted in electronic form (Compact Disc – CD) in PDF format.
3. The updates to any of these documents must be submitted to the Superintendency in electronic form (CD), in PDF format, indicating which pages were modified.
4. Any inquiries related to this issue must be sent to soporte@superbancos.gob.pa
5. The information previously submitted to the Superintendency of Banks of Panama in another format will be maintained in our files as is.

We would greatly appreciate your providing your staff with the necessary instructions for compliance with the provisions of this Circular.

Best regards,

Ricardo G. Fernández D.
Superintendent

RR/mddec.

"Velando por la solidez del Centro Bancario Internacional"