



INSTRUCTIONS FOR THE SUBMITTAL OF THE RISK FACTORS ATOM – BANKS (PB01) AND THE BANK GENERAL DATA ON AML ATOM (PB02)

The reporting must be made on a monthly basis. Cutoff dates will be the last day of every month. The information must be submitted to the Superintendency of Banks of Panama by the 30th or 31st day of the month following the cutoff date of every month.

A. Bank General Data on AML (PB02)

1	Date	The reporting must be made on a monthly basis. Cutoff dates will be the last day of every month. The information must be submitted to the Superintendency of Banks of Panama by the 30 th or 31 st day of the month following the cutoff date of every period.
2	Bank code	Bank code assigned by the SBP.
3	Prepared by	Name of the person filling out the document.
4	Position	Position held by the person filling out the document.
5	Compliance Officer's Name	Name of the Compliance Officer according to the last notification submitted to the Superintendency.
6	Compliance Officer's telephone number	Organization's telephone number at which the Compliance Officer can be contacted
7	Entity type	Banks are classified as follows: 01-Parent company; 02-Branch office; and 03-Subsidiary
8	Economic group's name	If the entity is a Panama-based parent company for a financial/economic group, please insert the name of the financial/economic group. If not applicable, please enter NA
9	Number of regulated affiliates	If the bank is a Parent Company, insert the number of regulated affiliates or subsidiaries.
10	Number of affiliates abroad	If the bank is a Parent company with subsidiaries or affiliates abroad, insert the number of regulated affiliates abroad.
11	Number of nonregulated affiliates	If the bank is a Parent Company with nonregulated affiliates or subsidiaries within the country or abroad, insert the number.
12	Holding Company name	Insert the name of the Parent Company to which the bank belongs. If not applicable, insert NA.
13	Total employees	Insert the total number of employees directly hired by the Bank, regardless of the type of relationship (hired, contracted, etc.)
14	Alternate Compliance Officer's Name	In the event of the temporary absence of the Principal Compliance Officer, [insert] the name of the person taking on the Compliance Officer's role and responsibilities.
15	Total Compliance structure	Number of persons working in the AML/CFT/WMD unit/area.
16	Monitoring tool name	Name of the monitoring tool the bank uses for AML/CFT/WMD purposes.
17	Monitoring tool version	If this tool has different versions, insert the current version the bank uses.



18	Monitoring tool implementation date	(YYYYMMDD) Date on which the bank started using the monitoring tool.
19	Monitoring tool last update date	(YYYYMMDD) Date on which the monitoring tool was last updated.
20	Monitoring tool supplier	If applicable, [insert the] name of the monitoring tool supplier.
21	Total red flags produced during the surveyed period	Number of red flags produced during the surveyed period.
22	Total red flags processed during the surveyed period	Number of red flags processed during the analyzed period. This means, the red flags closed after the relevant analysis.
23	Total red flags pending during the surveyed period	Number of red flags pending as of the cutoff date. All red flags pending, this means, including those that were produced before the reporting period.
24	Total number of employees assigned to analyze red flags	Number of employees assigned to analyze red flags.
25	Total number of Suspicious Transaction Reports during the period	Number of Suspicious Transaction Report(s) (STRs) sent to the Financial Analysis Unit (UAF) during the surveyed period.
26	Cash Transaction Reports (CTR) during the period Quantity	Number of Cash Transaction Reports during the surveyed period.
27	Cash Transaction Reports (CTR) during the period (monetary value)	Insert the total amount of the cash transactions reported in CTRs, according to the surveyed period.

B. Risk Factors Atom – Banks (PB01)

1	Date	The cutoff date of the analyzed period.
2	Bank code	Bank code assigned by the SBP.
3	Account code	“S” type account from Table SB 94 – Risk Factors Structure.
4	Person type	Insert the type of person according to the classification (01: Natural Person; 02: Legal person).
5	Quantity per factor	Customer Risk Factor: Insert total number of clients for the surveyed period. This box should be filled only with account items 1.000.000.000.000.000 to 1.006.003.000.000.000
		Product Risk Factor: Insert total number of clients holding products identified by variables 2.000.000.000.000.000 to 2.003.001.012.000.000
		Channel Risk Factor: Insert total number of clients using the channel for the surveyed period. This box should be filled only with account items 3.000.000.000.000.000 to 3.006.002.000.000.000
		Geographic Area Risk Factor: Insert total number of clients whose income comes from Geographic Zones indicated in the surveyed period. This box should be filled only with account items 4.000.000.000.000.000 to 4.003.004.000.000.000
6	Number of deposits	Insert total number of transactions (deposits) for each of the risk factor variables during the analyzed period.



7	Total deposits	Insert the sum of the amounts of the deposits for each of the risk factor variables during the analyzed period.
8	Number of withdrawals	Insert the total number of transactions (withdrawals) for each of the risk factor variables during the surveyed period.
9	Total withdrawals	Insert the sum of the amounts of the withdrawals for each of the risk factor variables during the analyzed period.

C. Table SB94 – Risk Factors Structure

In the event that any of the variables does not apply to your entity, it will not be reported.

Code	Variable	Description	Type of person to which it applies
1.000.000.000.000.000	CUSTOMER RISK FACTOR		
1.001.000.000.000.000	Total customers		
1.001.001.000.000.000	Total domestic customers	Clients holding Panamanian citizenship.	Natural or legal
1.001.002.000.000.000	Total foreign customers	Clients holding foreign citizenships.	
1.002.000.000.000.000	PEP Customers		
1.002.001.000.000.000	Customers classified as Domestic PEPs	Clients that the Bank has identified and classified as Panamanian PEP	Natural or legal
1.002.002.000.000.000	Customers classified as Foreign PEPs	Clients that the Bank has identified and classified as foreign PEP	
1.002.003.000.000.000	International organizations	Any international public official or any person authorized by the organization to act on its behalf	
1.003.000.000.000.000	Designated Non-Financial Businesses and Professions (DNFBPs)		
1.003.001.000.000.000	Real estate and construction		
1.003.001.000.000.000	Real estate developers	Natural or legal person engaged in promoting or developing real estate projects	Natural or legal
1.003.001.002.000.000	Construction companies, general contractors, specialized contractors	Natural or legal person engaged in construction, hired by the real estate developer management	Natural or legal
1.003.001.003.000.000	Real estate agents and realtors	Natural or legal person engaged to act in a usual and professional manner as mediator, broker, agent, representative or commission agent between the real estate owner and third parties for selling the property	Natural or legal



Code	Variable	Description	Type of person to which it applies
1.003.002.000.000.000	Free trade zone companies		
1.003.002.001.000.000	Colon Free Trade Zone	Clients running operations in the free trade area	Legal
1.003.002.002.000.000	Panamá Pacífico		
1.003.002.003.000.000	Barú Free Trade Zone and other Free Trade Zones		Legal
1.003.003.000.000.000	Casinos and gambling	Customers identified as casinos, games of chance and organization of betting systems and other physical or telematics establishments conducting these businesses through the internet	Legal
1.003.004.000.000.000	Professional activities		
1.003.004.001.000.000	CPA	Customers identified as lawyers, notaries, and accountants when these will conduct transactions on behalf of their customers in the following activities: 1. Purchase and sale of real estate 2. Management of the client's money, securities or other assets 3. Management of bank accounts, savings accounts or securities 4. Organization of funding for the establishment, operation or administration of businesses. 5. Establishment, operation or administration of legal persons or other legal arrangements, and purchase and sale of commercial entities	Natural or legal
1.003.004.002.000.000	Lawyers		
1.003.004.003.000.000	Public Notaries		
1.003.005.000.000.000	Mixed-venture		
1.003.005.001.000.000	Companies engaged in selling and purchasing new and used cars	Customers identified as companies engaged in the purchase and sale of new and used cars	Legal
1.003.005.002.000.000	Companies engaged in trading precious stones and metals	Customers identified as companies engaged in trading precious stones and metals in any forms	Legal
1.003.005.003.000.000	Pawnshops	Customers identified as pawnshops	Legal
1.003.005.004.000.000	Transportation of valuable goods	Customers identified as carriers of valuable goods	Legal



Code	Variable	Description	Type of person to which it applies
1.003.005.005.000.000	Post Office	This variable applies to entities with a contractual relationship with National Post Office	Legal
1.003.005.006.000.000	National Lottery	This variable applies to entities with a contractual relationship with the National Lottery	Legal
1.004.000.000.000.000	Fintech		
1.004.001.000.000.000	Total domestic customers	Startup or incumbent companies that are technology-based to provide financial services, such as banking, financing, fundraising, insurance, securities.	Legal
1.004.002.000.000.000	Total foreign customers		Legal
1.005.000.000.000.000	Other customer categories		
1.005.001.000.000.000	Customers conducting cash deposits	All customers making cash transactions from \$0.01 onwards. This includes deposits, payments, withdrawals, check cashing, etc.	Natural or legal
1.005.002.000.000.000	Trust funds	Customers that are trust funds, i.e., it refers to trust accounts of other trust companies, regardless of the trust license hold by the bank	Natural or legal
1.005.003.000.000.000	Customers classified as private interest foundations	Customers identified as private interest foundations	Legal
1.005.004.000.000.000	Customers classified as foundations and nonprofit organizations (NPO)	Customers identified as foundations or nonprofit organizations	Legal
1.005.005.000.000.000	Money service businesses (MSB)	Any natural or legal person holding an authorization from the Ministry of Commerce and Industry of Panama to run operations as a money service business providing remittance services in and from the country, whether or not it is their main activity	Natural or legal
1.005.006.000.000.000	Exchange bureaus	Any natural or legal person that provides services for the purchase and sale of coins, banknotes and other monetary instruments in and from the country, in any of its forms, whether or not it is their main activity.	Natural or legal
1.005.007.000.000.000	Ministries	Customers identified as ministries	Legal



Code	Variable	Description	Type of person to which it applies
1.006.000.000.000.000	Customer and risk classification		
1.006.001.000.000.000	High	Customers the bank has classified as high, medium and low risk	Natural or legal
1.006.002.000.000.000	Medium		
1.006.003.000.000.000	Low		
2.000.000.000.000.000	PRODUCT/SERVICE RISK FACTOR		
2.001.000.000.000.000	List of Asset Products		
2.001.001.000.000.000	Loans		
2.001.001.001.000.000	Loans (Retail, Wholesale, Mortgages, etc.)	The total customers having loans with the entity, regardless of the type of loan, i.e. consumer, commercial, mortgage, etc. Furthermore, this variable is given by inputs and outputs, where inputs (income) correspond to the counting (number of transactions – box 6) of payments made by the customer and the sum of amounts paid (box 7) to loans during the established period. The outputs correspond to the counting (box 8) of loans granted (disbursed) and the sum of amounts disbursed (box 9)	Natural or legal
2.001.002.000.000.000	Back-to-back loans		
2.001.002.001.000.000	Deposits and loans within the same bank	This variable corresponds to customers maintaining back-to-back loans, where the deposit and credit are in the same bank; this variable is given in inputs and outputs, where the inputs (or income) belong to the counting of products (box 6) and the sum of the deposit securing the loan (box 7). The outputs belong to counting (box 8) of loans granted (disbursed) and the sum of disbursed amounts (box 9).	Natural or legal
2.001.002.002.000.000	Deposits in one bank and loans in another	This variable corresponds to customers maintaining back-to-back loans, where the deposit is in the bank and the credit is in another bank. The transactional variable corresponds to the value of the deposit securing the loan and must be reported in boxes 6 and 7.	Natural or legal
2.001.002.003.000.000	Deposits in another bank and loans within this bank	This variable corresponds to customers maintaining back-to-back loans, where the deposit is in another bank and the credit is in this bank. This variable is	Natural or legal



Code	Variable	Description	Type of person to which it applies
		given by inputs and outputs, where inputs (income) correspond to counting (quantity of transactions – box 6) of the payments made by the customer and the sum of the amounts paid (box 7) to loans in the established period. The outputs correspond to counting (box 8) of loans granted (disbursed) and the sum of disbursed amounts (box 9)	
2.002.000.000.000.000	List of Liability Products		
2.002.001.000.000.000	Liabilities	Customers maintaining these products	Natural or legal
2.002.001.001.000.000	Checking accounts		
2.002.001.002.000.000	Savings accounts		
2.002.001.003.000.000	Term deposits		
2.002.002.000.000.000	Others		
2.002.002.001.000.000	Other unclassified products	Customers who maintain other products that have not been identified in this structure	Natural or legal
2.003.000.000.000.000	List of Service by Risk		
2.003.001.000.000.000	Services		
2.003.001.001.000.000	Private banking	Total number of customers in the private banking segment (classification maintained by the entity). Consider in transactionality for deposit products	Natural or legal
2.003.001.002.000.000	Mutual funds	Total number of customers maintaining mutual funds	Natural or legal
2.003.001.003.000.000	Letters of credit	Total number of customers holding letters of credit, the sum of letters of credit granted per customer and the sum of balance of such letters of credit during the established period. This information must be inserted in boxes 5, 6 and 7, respectively	Natural or legal
2.003.001.004.000.000	International wire transfers (sent/received)	Total number of customers sending and receiving international wire transfers	Natural or legal
2.003.001.005.000.000	Currency purchase/sale	Total number of customers (or non-customers) purchasing or selling foreign currency	Natural or legal
2.003.001.006.000.000	Safety deposit boxes	Total number of customers that have the safety deposit box services	Natural or legal
2.003.001.007.000.000	Third-party wealth management	Total number of customers maintaining management of third party funds agreements and the sum of the amount	Natural or legal



Code	Variable	Description	Type of person to which it applies
		of the agreements during the established period. This information must be inserted in boxes 5, 6 and 7, respectively	
2.003.001.008.000.000	Custodial (property/assets)	Total number of customers that are provided with the asset custodial service (third-party management) provided by the bank, in addition to the sum of the total value of custodies (report this value in box 7)	Natural or legal
2.003.001.009.000.000	Credit cards	Total number of customers maintaining credit cards, regardless of the limit granted	Natural or legal
2.003.001.010.000.000	Pre-paid cards	Total number of customers (or non-customers) who have acquired pre-paid cards during the surveyed period	Natural or legal
2.003.001.011.000.000	Virtual currencies	Total number of customers maintaining, using or making virtual currency transactions during the surveyed period	Natural or legal
2.003.001.012.000.000	Other unclassified services	Customers who maintain other services that have not been identified in this structure	
3.000.000.000.000.000	DISTRIBUTION CHANNELS RISK FACTOR		
3.001.000.000.000.000	Person-to-person		
3.001.001.000.000.000	Teller	Total number of customers conducting operations through teller	Natural or legal
3.002.000.000.000.000	Apps		
3.002.001.000.000.000	ATMs	Total number of customers conducting operations through ATMs	Natural or legal
3.002.002.000.000.000	Internet banking	Total number of customers conducting operations through internet banking	Natural or legal
3.002.003.000.000.000	Mobile banking	Total number of customers conducting operations through mobile banking	Natural or legal
3.002.004.000.000.000	Smart teller	Total number of customers conducting operations through smart teller	Natural or legal
3.003.00.000.000.000	Correspondents		
3.003.001.000.000.000	Nonbanking correspondents	Total number of customers conducting operations through nonbanking correspondents	Natural or legal
3.004.000.000.000.000	Correspondent banking		
3.004.001.000.000.000	Panamanian banks	Deposits that other local banks maintain in the entity	Legal
3.004.002.000.000.000	Foreign banks	Deposits other foreign banks maintain in the entity. It is important to consider	Legal



Code	Variable	Description	Type of person to which it applies
		as foreign banks the banks that are not Panamanian but hold a general license and foreign capital	
3.005.000.000.000.000	Financial Technology		
3.005.001.000.000.000	Fintech	Total number of customers (or non-customers) conducting operations through financial technologies	Natural or legal
3.006.000.000.000.000	Others		
3.006.001.000.000.000	Bank transactionality (interbank process)	Operations of the entity itself, payment to suppliers, funding, etc.	Legal
3.006.002.000.000.000	Other unclassified channels	Customers who maintain other channels that have not been identified in this structure	Natural or legal
4.000.000.000.000.000	GEOGRAPHIC ZONE RISK FACTOR		
4.001.000.000.000.000	Domestic zone (Panama)		
4.001.001.000.000.000	Province of Bocas del Toro	These variables correspond to the number of customers the Bank has in the branch offices located in these provinces	Natural or legal
4.001.002.000.000.000	Province of Coclé		Natural or legal
4.001.003.000.000.000	Province of Colón		Natural or legal
4.001.004.000.000.000	Province of Chiriquí		Natural or legal
4.001.005.000.000.000	Province of Darién		Natural or legal
4.001.006.000.000.000	Province of Herrera		Natural or legal
4.001.007.000.000.000	Province of Los Santos		Natural or legal
4.001.008.000.000.000	Province of Panama		Natural or legal
4.001.009.000.000.000	Province of Veraguas		Natural or legal
4.001.010.000.000.000	Province of Panamá Oeste		Natural or legal
4.002.000.000.000.000	Special zones		
4.002.001.000.000.000	Free-trade zones	These variables correspond to the number of customers the Bank has domiciled in these special areas	Natural or legal
4.002.002.000.000.000	Border zones		Natural or legal
4.002.003.000.000.000	Port zones		Natural or legal
4.002.004.000.000.000	Airport zones		Natural or legal
4.003.000.000.000.000	International zone		
4.003.001.000.000.000	Countries subject to United	Customers that are domiciled in countries subject to UN sanctions	Natural or legal



Code	Variable	Description	Type of person to which it applies
	Nations (UN) sanctions		
4.003.002.000.000.000	FATF-listed countries with inadequate controls	Customers that are domiciled in FATF-listed countries with inadequate controls	Natural or legal
4.003.003.000.000.000	Other high-risk countries according to the analysis conducted by the entity	Customers that are domiciled in other high-risk countries and that are not included in the above lists and the total deposits received during the period	Natural or legal
4.003.004.000.000.000	Rest of jurisdictions not subject to sanctions	The rest of the countries that are not included in any sanctions or deficiencies lists	Natural or legal

Remember that:

1. Any inquiry on this requirement must be sent to the following e-mail address: soporte@superbancos.gob.pa