



**INSTRUCTIONS FOR THE SUBMITTAL OF THE RISK FACTORS – TRUST COMPANY ATOM (PF01)
AND THE TRUST COMPANY GENERAL DATA ON AML ATOM (PF02)**

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.

PF02 – Trust Company General Data on AML (PB02)

Box N°	Name	Description
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 thirtieth (30 th) or thirty-first (31 st) day of the month following the cutoff date of each period.
2	Trust Company Code	Trust company 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 reached.
7	Economic Group's Name	If the entity is a Panama-based parent company for a financial/economic group, insert the name of the financial/economic group. If not applicable, enter NA
8	Number of regulated affiliates	If the entity is a Parent Company, insert the number of regulated affiliates and subsidiaries.
9	Number of affiliates abroad	If the entity is a Parent Company with affiliates or subsidiaries abroad, insert the number of regulated affiliates abroad
10	Number of nonregulated affiliates	If the entity is a Parent Company with nonregulated affiliates or subsidiaries within the country or abroad, insert the number.
11	Holding Company Name	Insert the name of the Parent Company to which the trust company belongs. If not applicable, insert NA.



Box N°	Name	Description
12	Total Employees	Insert the total number of employees directly hired by the entity, regardless of the type of relationship (hired, contracted, etc.)
13	Alternate Compliance Officer's Name	In case of the temporary absence of the Principal Compliance Officer, insert the name of the person taking on the Compliance Officer's role and responsibilities.
14	Total compliance structure	Number of persons working in the AML/CFT/WMD unit/area.
15	Monitoring tool name	Name of the monitoring tool the entity uses for ML/FT/WMD risk prevention.
16	Monitoring tool version	If this tool has different versions, insert the current version the entity uses.
17	Monitoring tool implementation date	(YYYYMMDD) Date on which the entity started using the monitoring tool.
18	Monitoring tool last update date	(YYYYMMDD) Date on which the monitoring tool was last updated.
19	Monitoring tool supplier	If applicable, insert the name of the monitoring tool supplier.
20	Total red flags produced during the surveyed period	Number of red flags produced during the surveyed period.
21	Total red flags processed during the surveyed period	Number of red flags processed during the surveyed period. This means, the red flags that were closed after the relevant analysis.
22	Total red flags pending during the surveyed period	Number of red flags pending processing during the surveyed period. All red flags pending, i.e., including those that were before the reporting period.
23	Total number of employees assigned to analyze red flags	Number of employees assigned to analyze red flags.
24	Total number of Suspicious Transaction Reports issued during the period	Number of Suspicious Transaction Report(s) (STRs) sent to the Financial Analysis Unit (UAF) during the surveyed period.
25	Cash Transaction Reports (CTR) during the period. Number	Number of Cash Transaction Report(s) (CTRs) for the period.



Box N°	Name	Description
26	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.
27	Total Assets	Insert total assets owned by the trust company (only those owned by the trust company).
28	Total fee income for trust fund management	Insert total fee income from trust fund management.
29	Total fee income for other services	Insert total fee income from other services offered by the trust company.
30	Number of trust fund agreements created under Panamanian law	Insert the number of agreements created under Panamanian Law.
31	Number of trust fund agreements created under other legislation	Insert the number of agreements created under other country laws.

PF01 Risk Factors – Trust Company Atom

Box N°	Name	Description
1	Date	The closing date for which the information is being reported.
2	Trust Company Code	Trust company code assigned by the SBP.
3	Account Code	“S” type account from Table FD09 – Risk Factor Structure.
4	Person Type	Insert the type of person according to their classification (01: Natural person or 02: Legal persons).
5	Quantity per factor	Customer Risk Factor: Insert total number of settlers/clients (<i>conducting they conduct transactions or not</i>) for the surveyed period. This box should be filled only with account items 1.000.000.000.000.000 to 1.008.004.000.000.000. Product Risk Factor: Insert total number of settlers/clients holding products identified by variables 2.000.000.000.000.000 to 2.008.006.000.000.000. Channel Risk Factor: Insert total number of settlers/clients using the channel for the surveyed period. This box should be filled only with account items 3.000.000.000.000.000 to 3.004.005.000.000.000.



Box N°	Name	Description
		Geographic Area Risk Factor: Insert total number of settlers/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 to 4.003.004.000.000.000.
6	Total Number of Inputs (Deposits)	Insert total number of input transactions (either deposits, wire transfers or any transaction representing an input) for each of the risk factor variables during the surveyed period.
7	Total Input (Deposits). Amount	Insert the sum of the value of the input transactions (either deposits, wire transfers or any transaction representing an input) for each of the risk factor variables during the surveyed period.
8	Total Number of Outputs (Withdrawals)	Insert the total number of output transactions (withdrawals, wire transfers or any transaction representing a debit or withdrawal) for each of the risk factor variables during the surveyed period.
9	Total Output (Withdrawals). Amount	Insert the sum of the value of the outputs (withdrawals, wire transfers or any transaction representing a debit or withdrawal) for each of the risk factor variables during the surveyed period.
10	Total Fees Charged (Amount)	Insert the sum of the amounts of fees charged for each of the risk factor variables during the surveyed period.
11	Total assets entrusted (Amount)	Insert the sum of the assets entrusted for management, for each of the risk factor variables during the surveyed period.

C. Table FD03 – 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 settlers	Clients holding Panamanian citizenship.	Natural or legal
1.001.002.000.000.000	Total foreign settlers	Clients holding foreign citizenships.	
1.002.000.000.000.000	Other activities customers	All types of customers/settlers under your trust license, either for trust services or other activities established	



Code	Variable	Description	Type of person to which it applies
		in Chapter II, Art. 20 of Law 21 dated 10 May 2017.	
1.002.001.000.000.000	Total domestic	Customers holding Panamanian citizenship using the services provided by the trust company (understood as customers who are not settlors neither are related to any trust fund nor to the trust fund product itself) according to the provisions of Chapter II, Art. 20 of Law 21 dated 10 May 2017.	Natural or legal
1.002.002.000.000.000	Total foreign	Customers holding foreign citizenship using the services provided by the trust company (understood as customers who are not settlors neither are related to any trust fund), as provided for in Chapter II, Art. 20 of Law 21 dated 10 May 2017.	Natural or legal
1.003.000.000.000.000	PEP Customers		
1.003.001.000.000.000	Customers/settlors classified as Domestic PEPs	Individuals holding Panamanian citizenship (customers/settlors) having products such as trust agreements or other activities, according to the provisions of Chapter II, Art 20 of Law 21 dated 10 May 2017.	Natural or legal
1.003.002.000.000.000	Customers/settlors classified as Foreign PEPs	Individuals holding foreign citizenships (customers/settlors) having products such as trust agreements or other activities, according to the provisions of Chapter II, Art. 20 of Law 21 dated 10 May 2017.	Natural or legal
1.003.003.000.000.000	Customers/settlors from International organizations	Any individual conducting or entrusted with important duties by an international organization (customers/settlors) having products such as trust agreements or other activities, according to the provisions of Chapter II, Art. 20 of Law 21 dated 10 May 2017.	Natural or legal
1.004.000.000.000.000	Designated Non-Financial Businesses and Professions (DNFBPs)		
1.004.001.000.000.000	Real estate and construction		
1.004.001.001.000.000	Real estate developers	Customers/settlors engaged in promoting or developing real estate projects	Natural or legal



Code	Variable	Description	Type of person to which it applies
1.004.001.002.000.000	Construction companies, general contractors, specialized contractors	Customers/settlers engaged in construction, hired by the real estate developer management	Natural or legal
1.004.001.003.000.000	Real estate agents and realtors	Customers/settlers 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
1.004.002.000.000.000	Free trade zone companies		
1.004.002.001.000.000	Colon Free Trade Zone	Customers/ settlor sunning operations in the free trade zone	Legal
1.004.002.002.000.000	Panamá Pacífico		
1.004.002.003.000.000	Baru Free Trade Zone and other Free Trade Zones		
1.004.003.000.000.000	Casinos and gambling	Customers/settlers identified as casinos, games of chance and organization of betting systems and other physical or telematics establishments developing these businesses through the internet	Legal
1.004.004.000.000.000	Professional activities		
1.004.004.001.000.000	CPA	Customers/settlers identified as lawyers, public notaries, and accountants when these will conduct transactions on behalf of their customers on 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 valuables 4. Organization of funding for the establishment, operation or administration of businesses. 5. Establishment, operation or administration of legal person or other legal arrangements, and purchase and sale of commercial entities	Natural or legal
1.004.004.002.000.000	Lawyers		
1.004.004.003.000.000	Public Notaries		
1.004.005.000.000.000	Mixed-venture		



Code	Variable	Description	Type of person to which it applies
1.004.005.001.000.000	Companies engaged in selling and purchasing used and new cards	Customers/settlors identified as companies engaged in purchasing and selling new and used cars	Legal
1.004.005.002.000.000	Companies engaged in trading precious stones and metals	Customers/settlors identified as companies engaged in trading precious stones and metals in any of its forms	Legal
1.004.005.003.000.000	Pawnshops	Customers/settlors identified as pawnshops	Legal
1.004.005.004.000.000	Transportation of valuable goods	Customers/settlors identified as carriers of valuable goods	Legal
1.004.005.005.000.000	Post Office	This variable applies to entities holding a contractual relationship with National Post Office	Legal
1.004.005.006.000.000	National Lottery	This variable applies to entities holding a contractual relationship with the National Lottery	Legal
1.005.000.000.000.000	Fintech		
1.005.001.000.000.000	Total domestic customers	Startup or incumbent companies that are based on technology to provide financial services, such as banking, financing, fundraising, insurance, securities.	Natural or legal
1.005.002.000.000.000	Total foreign customers		Natural or legal
1.006.000.000.000.000	Other customer categories		
1.006.001.000.000.000	Settlors conducting cash deposits	All customers/settlors making cash transactions from \$0.001 onwards. This includes deposits, payments, withdrawals, check cashing, etc.	Natural or legal
1.006.002.000.000.000	Settlors classified as private interest foundations	Customers/settlors identified as private interest foundations	Natural or legal
1.006.003.000.000.000	Settlors classified as foundations and nonprofit organizations (NPO)	Customers/settlor identified as foundations or nonprofit organizations (NPO)	Legal
1.006.004.000.000.000	Money service businesses (MSB)	Customers/settlors holding an authorization from the Ministry of Commerce and Industry of Panama to run operations as money service businesses providing remittance services in and from the country, whether or not it is their main activity	Natural or legal



Code	Variable	Description	Type of person to which it applies
1.006.005.000.000.000	Exchange bureaus	Customers/settlers that provide services for purchasing and selling 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
1.007.000.000.000.000	Customer and risk classification		
1.007.001.000.000.000	High	Settlers the trust company has classified as high risk	Natural or legal
1.007.002.000.000.000	Medium	Settlers the trust company has classified as medium risk	
1.007.003.000.000.000	Low	Settlers the trust company has classified as low risk	
1.008.000.000.000.000	Classification of customers of other corporate activities by risk assigned by the Trust Company		
1.008.001.000.000.000	High	Customers of other corporate activities the trust company has classified as high risk	Natural or legal
1.008.002.000.000.000	Medium	Customers of other corporate activities the trust company has classified as medium risk	
1.008.003.000.000.000	Low	Customers of other corporate activities the trust company has classified as low risk	
2.000.000.000.000.000	PRODUCT/SERVICE RISK FACTOR		
2.001.001.000.000.000	Administration trust	The trust fund where the settlor gives goods or rights to the trustee to manage them, according to the provisions of the agreement. It is important to mention that for this stage the Pension-Severance Fund apply, as they require a trustee to manage them.	
2.001.001.001.000.000	Assets in Panama	Total number of customers/settlers holding this product in Panama	Natural or legal
2.001.002.000.000.000	Assets abroad	Total number of customers/settlers holding this product abroad	
2.001.003.000.000.000	Assets in Panama and abroad	Total number of customers/settlers holding this product in Panama and abroad	
2.001.004.000.000.000	Assets in free-trade zones	Total number of customers/settlers holding this product in free-trade zones	
2.002.000.000.000.000	Investment trust		



Code	Variable	Description	Type of person to which it applies
2.002.001.000.000.000	Assets in Panama	Total number of customers/settlers holding this product in Panama	Natural or legal
2.002.002.000.000.000	Assets abroad	Total number of customers/settlers holding this product abroad	Natural or legal
2.002.003.000.000.000	Assets in Panama and abroad	Total number of customers/settlers holding this product in Panama and abroad	
2.002.004.000.000.000	Assets in free-trade zones	Total number of customers/settlers holding this product in free-trade zones	
2.003.000.000.000.000	Guarantee trust		
2.003.001.000.000.000	Assets in Panama	Total number of customers/settlers holding this product in Panama	Natural or legal
2.003.002.000.000.000	Assets abroad	Total number of customers/settlers holding this product abroad	
2.003.003.000.000.000	Assets in Panama and abroad	Total number of customers/settlers holding this product in Panama and abroad	
2.003.004.000.000.000	Assets in free-trade zones	Total number of customers/settlers holding this product in free-trade zones	
2.004.000.000.000.000	Other		
2.004.001.000.000.000	Underlying asset trust (Securitization)	The trust agreement where the settlor gives goods or rights to the trustee so that based on the real value of those and its future income, the trustee issues securities to be placed in the market. Total number of customers/settlers holding this product	Natural or legal
2.005.000.000.000.000	Real estate or construction trust		
2.005.001.000.000.000	Assets in Panama	Total number of customers/settlers holding this product in Panama	Legal
2.005.002.000.000.000	Assets abroad	Total number of customers/settlers holding this product abroad	
2.006.000.000.000.000	Testamentary trust		
2.006.001.000.000.000	Assets in Panama	Total number of customers/settlers holding this product in Panama	Natural or legal
2.006.002.000.000.000	Assets abroad	Total number of customers/settlers holding this product abroad	
2.006.003.000.000.000	Assets in Panama and abroad	Total number of customers/settlers holding this product in Panama and abroad	



Code	Variable	Description	Type of person to which it applies
2.006.004.000.000.000	Assets in free-trade zones	Total number of customers/settlers holding this product in free-trade zones	
2.007.000.000.000.000	Share trust		
2.007.001.000.000.000	Assets in Panama	Total number of customers/settlers holding this product in Panama	Legal
2.007.002.000.000.000	Assets abroad	Total number of customers/settlers holding this product abroad	
2.007.003.000.000.000	Assets in Panama and abroad	Total number of customers/settlers holding this product in Panama and abroad	
2.007.004.000.000.000	Assets in free-trade zones	Total number of customers/settlers holding this product in free-trade zones	
2.008.000.000.000.000	Other corporate or trust services provided	Any other activity or service other than the trust business. The activities that are not trust agreements as provided for in Chapter II, Art. 20 of Law 21 dated 10 May 2017.	
2.008.001.000.000.000	Escrow account	Total customers holding this type of product	Natural or legal
2.008.002.000.000.000	Financial advisory services		Natural or legal
2.008.003.000.000.000	Acting as representative with voting rights I shareholders or partners meetings and acting as representative of bondholders and other securities holder	Total customers holding this type of service with the entity. The monetary value or amount comes from the income, revenue or fees charged for the service rendered and must be reported in box 10 Total Charged Fees (Amount)	Natural or legal
2.008.004.000.000.000	Participating or intermediating in creating and/or managing corporate, trust and foundation structures		
2.008.005.000.000.000	Acting as custodians of shares, documents and valuables	Total customers to which the entity provides custodial service in addition to the sum of the total value of custodial services (report this amount in box 7)	Natural or legal



Code	Variable	Description	Type of person to which it applies
2.008.006.000.000.000	Other services authorized by the SBP	Customers or settlors holding other services that have not been identified in the structure.	Natural or legal
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	Cashier	Total number of customers/settlors conducting operations through ATMs	Natural or legal
3.002.000.000.000.000	Apps		
3.002.001.000.000.000	Internet banking	Total number of customers/settlors conducting operations through internet banking	Natural or legal
3.002.002.000.000.000	Mobile banking	Total number of customers/settlors conducting operations through mobile banking	Natural or legal
3.003.00.000.000.000	Financial Technology		
3.003.001.000.000.000	Fintech	Total number of customers/settlors (or non-customers) conducting operations through financial technologies	Natural or legal
3.004.000.000.000.000	Agreement Origin (Entailment)		
3.004.001.000.000.000	Entering into trust agreements referred by entities to which the trust company belongs	Total number of customers/settlors referred by entities to which the trust company belongs, as well as the total of assets and rights entrusted	Natural or legal
3.004.002.000.000.000	Entering into trust agreements referred by entities outside the group	Total number of customers/settlors referred by foreign entities to which the trust company belongs, as well as the total of assets and rights entrusted	Natural or legal
3.004.003.000.000.000	Entering into trust agreements referred to by foreign brokers	Total number of customers/settlors referred to by foreign brokers, as well as the total assets and rights entrusted	Natural or legal
3.004.005.000.000.000	Other unclassified channels	Total number of customers/settlors referred to by other unclassified channels, as well as the total assets and rights entrusted	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		
4.001.003.000.000.000	Province of Colón		



Code	Variable	Description	Type of person to which it applies
4.001.004.000.000.000	Province of Chiriquí		
4.001.005.000.000.000	Province of Darién		
4.001.006.000.000.000	Province of Herrera		
4.001.007.000.000.000	Province of Los Santos		
4.001.008.000.000.000	Province of Panama		
4.001.009.000.000.000	Province of Veraguas		
4.001.010.000.000.000	Province of Panama Oeste		
4.002.000.000.000.000	Special zones	These variables correspond to the number of customers the Bank has domiciled in these special areas	
4.002.001.000.000.000	Free-trade zones		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 Nations (UN) sanctions	Customers that are domiciled in countries subject to UN sanctions	Natural or legal
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