



**INSTRUCTIONS FOR THE SUBMITTAL OF THE TRUST SERVICE PROVIDER RISK FACTORS REPORT (PF01) AND
THE GENERAL DATA ON AML REPORT (PF02)**

The reporting must be made monthly. 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)

Field/ Box N°	Name	Description of the Data to be Reported
1	Date	The closing date for which the information is being reported.
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 Name	Name of the Compliance Officer according to the last notification submitted to the Superintendency.
6	Compliance Officer telephone number	Organization's telephone number at which the Compliance Officer can be reached.
7	Economic Group 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.
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 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.



Field/ Box N°	Name	Description of the Data to be Reported
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	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 surveyed period.
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.



Field/ Box N°	Name	Description of the Data to be Reported
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 established under Panamanian law	Insert the number of agreements established under Panamanian Law.
31	Number of trust fund agreements established under other laws	Insert the number of agreements established under other country laws.
32	Number of contracts for other corporate activities or services established under Panamanian law	Insert the number of contracts for other corporate activities or services established under Panamanian law.
33	Number of contracts for other corporate activities or services established under other laws	Insert the number of contracts for other corporate activities or services established under other country laws.
34	Total assets entrusted	Insert the sum of the current assets entrusted to be managed for the surveyed period.
35	Total liabilities entrusted	Insert the sum of the current liabilities entrusted to be managed for the surveyed period.
36	Total assets in Other Corporate Activities	Insert the sum of assets entrusted in other corporate activities or services to be managed for the surveyed period.

PF01 Risk Factors – Trust Company Report

Field/ Box N.°	Name	Description of the Data to be Reported
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 person).
5	Quantity per factor	Customer Risk Factor: Insert total number of settlers/customers (whether they conduct transactions) for the surveyed period. This box should be filled only with account items 1.000.000.000.000.000 to 1.009.002.006.000.000.



Field/ Box N.º	Name	Description of the Data to be Reported
		<p>Product Risk Factor: Insert total number of settlers/customers (whether they conduct transactions) holding products identified by variables 2.000.000.000.000.000 to 2.009.003.000.000.000.</p> <p>Channel Risk Factor: Insert total number of settlers/customers who: a) use channels for conducting transactions for the surveyed period. This field/box should be filled only with account items 3.001.001.000.000.000.000 to 3.003.001.000.000.000; and b) channel through which active settlers/customers are entailed (whether they conduct transactions) for the surveyed period. This field/box should be filled only with account items 3.004.001.000.000.000.000 to 3.004.006.000.000.000.</p> <p>Geographic Area Risk Factor: Insert total number of active settlers/customers (whether they conduct transactions) according to their domicile for the surveyed period. This field/box should be filled only with account items 4.000.000.000.000.000 to 4.003.004.000.000.000.</p>
6	Total incoming transactions (Deposits)	Insert total number of incoming transactions (either deposits, wire transfers or any transaction representing an income) for each of the risk factor variables during the surveyed period.
7	Total incoming transactions (Deposits). Amount	Insert the sum of the incoming transactions (either deposits, wire transfers or any transaction representing an income) for each of the risk factor variables during the surveyed period.
8	Total outgoing transactions (Withdrawals)	Insert the total number of outgoing 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 outgoing transactions (Withdrawals). Amount	Insert the sum of outgoing transactions (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 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 and/or other corporate services for management, for each of the risk factor variables during the surveyed period.
12	Quantity of agreements	Report the total of active agreements (trust or other corporate services or activities) related to each trust customer during the surveyed period.



C. Table FD03 – Risk Factors Structure

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 number of settlors		
1.001.001.000.000.000	Total domestic settlors	Customers holding Panamanian citizenship.	Natural or legal
1.001.002.000.000.000	Total foreign settlors	Customers holding foreign citizenships.	
1.002.000.000.000.000	Other activities customers		
1.002.001.000.000.000	Total other activities domestic customers	Customers holding Panamanian citizenship using the corporate services provided by the trust company (whether settlor or not) 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 other activities foreign customers	Customers holding a foreign citizenship using the corporate services provided by the trust company (whether settlor or not) according to the provisions of Chapter II, Art. 20 of Law 21 dated 10 May 2017.	
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 a foreign 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.	
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.	
1.004.000.000.000.000	Designated Nonfinancial 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
1.004.001.002.000.000	Construction companies, general contractors,	Customers/settlors engaged in construction services, hired by the real estate developer management.	



Code	Variable	Description	Type of person to which it applies
	specialized contractors		
1.004.001.003.000.000	Real estate agents and realtors	Customers/settlers acting 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.	
1.004.002.000.000.000	Free trade zone companies		
1.004.002.001.000.000	Colón Free Trade Zone	Customers/ settlor running operations in a free-trade zone	Legal
1.004.002.002.000.000	Panamá Pacífico		
1.004.002.003.000.000	Barú 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 conduct transactions on behalf of their customers on the following activities:	Natural or legal
		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.			
1.004.004.002.000.000	Lawyers	5. Establishment, operation or administration of legal person or other legal arrangements, and purchase and sale of commercial entities.	
1.004.004.003.000.000	Public Notaries		
1.004.005.000.000.000	Mixed venture		
1.004.005.001.000.000	Car dealers (new and used cars)	Customers/settlers identified as car dealers (new and used cars)	Legal
1.004.005.002.000.000	Precious stones and metals traders	Customers/settlers identified precious stones and metals traders (in any of its forms).	
1.004.005.003.000.000	Pawnshops	Customers/settlers identified as pawnshops.	
1.004.005.004.000.000	Transportation of valuable goods	Customers/settlers identified as carriers of valuable goods.	



Code	Variable	Description	Type of person to which it applies
1.004.005.005.000.000	Post Office	This variable applies to entities holding a contractual relationship with National Post Office.	
1.004.005.006.000.000	National Lottery	This variable applies to entities holding a contractual relationship with the National Lottery.	
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.	Legal
1.005.002.000.000.000	Total foreign customers	Startup or incumbent companies that are based on technology to provide financial services, such as banking, financing, fundraising, insurance, securities.	
1.006.000.000.000.000	Other customer categories		
1.006.001.000.000.000	Customers conducting cash transactions	Customers/settlers, according to their nationality, making cash transactions from \$0.001 onwards. This includes deposits, payments, withdrawals, check cashing, etc.	Natural or legal
1.006.001.001.000.000	Domestic customers conducting cash transactions	Customers/settlers of Panamanian citizenship making cash transactions from \$0.01 onwards. This includes deposits, payments, withdrawals, check cashing, etc.	
1.006.001.002.000.000	Foreign customers conducting cash transactions	Customers/settlers of foreign citizenship making cash transactions from \$0.01 onwards. This includes deposits, payments, withdrawals, check cashing, etc.	
1.006.002.000.000.000	Customers classified as private interest foundations	Customers/settlers identified as private interest foundations.	Legal
1.006.003.000.000.000	Customers classified as foundations and nonprofit organizations (NPO)	Customers/settlers identified as foundations or nonprofit organizations (NPO)	
1.006.004.000.000.000	Money service businesses (MSB)	Customers/settlers holding an authorization from the Ministry of Commerce and Industry of Panama to run operations as money service businesses providing money remittance services in and from the country, whether 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 it is their main activity.	
1.006.006.000.000.000	Total Virtual Assets customers	Startup or incumbent companies that are based on providing services related to virtual assets.	Legal
1.007.000.000.000.000	Settlor 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	Other corporate activities customers risk classification		
1.008.001.000.000.000	High	Customers of other activities the trust company has classified as high risk.	Natural or legal
1.008.002.000.000.000	Medium	Customers of other activities the trust company has classified as medium risk.	
1.008.003.000.000.000	Low	Customers of other activities the trust company has classified as low risk.	
1.009.000.000.000.000	Corporations & Foundations		
1.009.001.000.000.000	Corporations or foundations acting as settlors		
1.009.001.001.000.000	Corporations with Nominee Shareholders	Legal person settlors (corporations) with shareholders provided by a resident agent (nominee) and/or appointed by the settlor himself.	Legal
1.009.001.002.000.000	Corporations with Nominee Directors	Legal person settlors (corporations) with directors provided by a resident agent and/or by the settlor himself.	
1.009.001.003.000.000	Beneficiary legal person (corporations)	The quantity of legal persons (corporations) who are beneficiaries of trusts having directors provided by a resident agent and/or by the settlor himself and/or a third party. The total beneficiaries meeting this definition must be inserted in field/box 5.	
1.009.001.004.000.000	Foundations with Nominee Foundation Council members	Legal person settlors (foundations) having foundation council members provided by a resident agent and/or by the settlor himself.	
1.009.001.005.000.000	Bearer share corporations	Legal person settlors (corporations) holding bearer shares.	
1.009.001.006.000.000	Beneficiary (Foundations)	The quantity of legal persons (foundations) who are beneficiaries of trusts provided by a	



Code	Variable	Description	Type of person to which it applies
		resident agent and/or the settlor himself. The total beneficiaries meeting this definition must be inserted in field/box 5.	
1.009.002.000.000.000	Other corporate activities or services customers that are foundations		corporations or
1.009.002.001.000.000	Corporations with Nominee Shareholders	Legal person settlors (corporations) with shareholders provided by a resident agent (nominee) and/or appointed by the settlor himself.	Legal
1.009.002.002.000.000	Corporations with Nominee Directors	Legal person settlors (corporations) with directors provided by a resident agent and/or by the settlor himself.	
1.009.002.003.000.000	Beneficiary legal person (corporations)	The quantity of legal persons (corporations) who are beneficiaries of corporate service contracts having directors provided by a resident agent and/or the settlor himself and/or a third party. The total beneficiaries meeting this definition must be inserted in field/box 5.	
1.009.002.004.000.000	Foundations with Nominee Foundation Council members	Legal person settlors (foundations) having foundation council members provided by a resident agent and/or by the settlor himself.	
1.009.002.005.000.000	Bearer share corporations	Legal person settlors (corporations) holding bearer shares.	
1.009.002.006.000.000	Beneficiary (Foundations)	The quantity of legal persons (foundations) who are beneficiaries of corporate service agreements provided by a resident agent and/or by the settlor himself. The total beneficiaries meeting this definition must be inserted in field/box 5.	
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 assets or rights to the trustee to administer them, according to the provisions of the agreement. It is important to point out that for this stage the Pension-Severance Fund apply, since a trustee is required to administer them.	
2.001.001.001.000.000	Assets in Panama	Total number of settlors holding this product in Panama.	Natural or legal
2.001.002.000.000.000	Assets abroad	Total number of settlors holding this product abroad.	
2.001.003.000.000.000	Assets in Panama and abroad	Total number of settlors holding this product in Panama and abroad.	



Code	Variable	Description	Type of person to which it applies
2.001.004.000.000.000	Assets in free-trade zones	Total number of settlors holding this product in free-trade zones.	
2.001.005.000.000.000	New trusts	Total number of settlors that started trust agreements during the period to be reported.	
2.001.006.000.000.000	Terminated trusts	Total number of settlors whose trust agreements were terminated during the period to be reported.	
2.002.000.000.000.000	Investment trust	The trust fund where the settlor gives a certain amount of assets or rights to the trustee to place funds, securities or other assets in several projects or types of productive investments, whose proceeds will be distributed to the settlor himself or the beneficiary, according to the instructions given by the settlor.	Natural or legal
2.002.001.000.000.000	Assets in Panama	Total number of settlors holding this product in Panama.	
2.002.002.000.000.000	Assets abroad	Total number of settlors holding this product abroad.	
2.002.003.000.000.000	Assets in Panama and abroad	Total number of settlors holding this product in Panama and abroad.	
2.002.004.000.000.000	Assets in free-trade zones	Total number of settlors holding this product in free-trade zones.	
2.002.005.000.000.000	Virtual assets	Total number of settlors holding this product invested in virtual assets.	
2.002.006.000.000.000	New trusts	Total number of settlors that started trust agreements during the period to be reported.	
2.002.007.000.000.000	Terminated trusts	Total number of settlors whose trust agreements were terminated during the period to be reported.	
2.003.000.000.000.000	Guarantee trust	The trust fund where the settlor makes an irrevocable transfer of ownership of the assets to the trustee aimed at securing the fulfillment of obligations by the settlor or third parties for the benefit of one or more creditors.	Natural or legal
2.003.001.000.000.000	Assets in Panama	Total number of settlors holding this product in Panama.	
2.003.002.000.000.000	Assets abroad	Total number of settlors holding this product abroad.	
2.003.003.000.000.000	Assets in Panama and abroad	Total number of settlors holding this product in Panama and abroad.	
2.003.004.000.000.000	Assets in free-trade zones	Total number of settlors holding this product in free-trade zones.	
2.003.005.000.000.000	Trusts securing consumer loans (car, mortgage)	Total number of agreements securing consumer loans (car, mortgages).	



Code	Variable	Description	Type of person to which it applies
2.003.006.000.000.000	New trusts	Total number of settlors that started trust agreements during the period to be reported.	
2.003.007.000.000.000	Terminated trusts	Total number of settlors whose trust agreements were terminated during the period to be reported.	
2.004.000.000.000.000	Underlying asset trust (Securitization)	The trust agreement where the settlor gives assets or rights to the trustee so that, based on their real value and future income, the trustee issues securities to be placed on the market.	Natural or legal
2.004.001.000.000.000	Assets in Panama	Total number of settlors holding this product in Panama.	
2.004.002.000.000.000	Assets abroad	Total number of settlors holding this product abroad.	
2.004.003.000.000.000	Assets in Panama and abroad	Total number of settlors holding this product in Panama and abroad.	
2.004.004.000.000.000	Assets in free-trade zones	Total number of settlors holding this product in free-trade zones	
2.004.005.000.000.000	New trusts	Total number of settlors that started trust agreements during the period to be reported.	
2.004.006.000.000.000	Terminated trusts	Total number of settlors whose trust agreements were terminated during the period to be reported.	
2.005.000.000.000.000	Real estate or construction trust	The trust that includes the administration, construction, and marketing of real estate projects and the distribution of financial results to the beneficiaries appointed by the settlor.	
2.005.001.000.000.000	Assets in Panama	Total number of settlors holding this product in Panama.	
2.005.002.000.000.000	Assets abroad	Total number of settlors holding this product abroad.	
2.005.003.000.000.000	Assets in Panama and abroad	Total number of settlors holding this product in Panama and abroad.	
2.005.004.000.000.000	Assets in free-trade zones	Total number of settlors holding this product in free-trade zones.	
2.005.005.000.000.000	New trusts	Total number of settlors that started trust agreements during the period to be reported.	
2.005.006.000.000.000	Terminated trusts	Total number of settlors whose trust agreements were terminated during the period to be reported.	
2.006.000.000.000.000	Testamentary trust	This trust corresponds to the management of goods and assets during the settlor's life. This trust, upon the settlor's death, is irrevocable and will be managed according to the established instructions, delivering the goods to the appointed beneficiaries and under agreed on conditions.	



Code	Variable	Description	Type of person to which it applies
2.006.001.000.000.000	Assets in Panama	Total number of settlors holding this product in Panama.	Natural or legal
2.006.002.000.000.000	Assets abroad	Total number of settlors holding this product abroad.	
2.006.003.000.000.000	Assets in Panama and abroad	Total number of settlors holding this product in Panama and abroad.	
2.006.004.000.000.000	Assets in free-trade zones	Total number of settlors holding this product in free-trade zones.	
2.006.005.000.000.000	New trusts	Total number settlors that started trust agreements during the period to be reported.	
2.006.006.000.000.000	Terminated trusts	Total number of settlors whose trust agreements were terminated during the period to be reported.	
2.007.000.000.000.000	Share trust	The trust in which some shareholders act as settlors and contribute with shares and/or stocks of certain corporations for the trustee to execute the rights derived from the shares and/or stocks as agreed by the parties for their benefit	
2.007.001.000.000.000	Assets in Panama	Total number of settlors holding this product in Panama.	Natural or legal
2.007.002.000.000.000	Assets abroad	Total number of settlors holding this product abroad.	
2.007.003.000.000.000	Assets in Panama and abroad	Total number of settlors holding this product in Panama and abroad.	
2.007.004.000.000.000	Assets in free-trade zones	Total number of settlors holding this product in free-trade zones.	
2.007.005.000.000.000	New trusts	Total number settlors that started trust agreements during the period to be reported.	
2.007.006.000.000.000	Terminated trusts	Total number of settlors whose trust agreements were terminated during the period to be reported.	
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	Total customers holding this type of product.	
2.008.003.000.000.000	Acting as representative with voting rights in shareholders or partners meetings and acting as representative of	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 field/box 10: Total Fees Charged (Amount).	



Code	Variable	Description	Type of person to which it applies
	bondholders and another securities holder.		
2.008.004.000.000.000	Participating or intermediating in creating and/or managing corporate, trust and foundation structures	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 field/box 10: Total Fees Charged (Amount).	
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.	
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.	
2.009.000.000.000.000	Special contracts	This section corresponds only to reporting the settlors who have contracts under the below conditions.	
2.009.001.000.000.000	Protectors	Total of settlors having a protector, Protector Committee or similar.	Legal
2.009.002.000.000.000	Trusts with automatic change of residence clauses	Total number of settlors having trust agreements including automatic change of residence clauses.	Natural or legal
2.009.003.000.000.000	Trusts established in perpetuity	Total number of settlors having trusts established in perpetuity.	
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
3.001.002.000.000.000	Instruction to the banking entity	Total number of customers/settlors whose operations are conducted through instructions to the banking entity, whether it be through e-mail, phone call or going physically to the bank.	
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 (online banking).	Natural or legal
3.002.002.000.000.000	Mobile banking	Total number of customers/settlors conducting operations through mobile banking.	
3.003.00.000.000.000	Financial Technology		



Code	Variable	Description	Type of person to which it applies
3.003.001.000.000.000	Fintech	Total number of customers/settlers (or non-customers) conducting operations through financial technologies.	Natural or legal
3.004.000.000.000.000	Agreement Origin (Entailment)	The means the trust service provider uses to entering into agreements with its customers/settlers.	
3.004.001.000.000.000	Entering into trust agreements referred by entities to which the trust company belongs	Total number of customers/settlers 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/settlers referred by foreign entities to which the trust company belongs, as well as the total of assets and rights entrusted.	
3.004.003.000.000.000	Entering into trust agreements referred by local brokers	Total number of customers/settlers referred by local brokers, as well as the total assets and rights entrusted.	
3.004.004.000.000.000	Entering into trust agreements referred to by foreign brokers	Total number of customers/settlers referred by foreign brokers, as well as the total assets and rights entrusted.	
3.004.005.000.000.000	Other unclassified channels	Total number of customers/settlers referred by other unclassified channels, as well as the total assets and rights entrusted.	
3.004.006.000.000.000	Entering into trust agreements at on-boarding by the trust service provider	Total number of customers/settlers referred by the trust service provider staff, partners, top management or through its website.	
4.000.000.000.000.000	GEOGRAPHIC ZONE RISK FACTOR		
4.001.000.000.000.000	Domestic zone (Panama)	These variables correspond to the number of customers/settlers the trust company according to their <u>location/domicile</u> in the country.	
4.001.001.000.000.000	Province of Bocas del Toro	Total number of active customers/settlers of the trust service provider according to their domicile in the Republic of Panama is required.	Natural or legal
4.001.002.000.000.000	Province of Coclé		
4.001.003.000.000.000	Province of Colón		
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		



Code	Variable	Description	Type of person to which it applies
4.001.007.00.000.000	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/settlers the trust service provider has <u>domiciled</u> in these special areas.	Natural or legal
4.002.001.000.000.000	Free-trade zones	Total number of customers/settlers the trust service provider has domiciled in free-trade zones.	
4.002.002.000.000.000	Border zones	Total number of customers/settlers the trust service provider has domiciled in border zones.	
4.002.003.000.000.000	Port zones	Total number of customers/settlers the trust service provider has domiciled in port zones.	
4.002.004.000.000.000	Airport zones	Total number of customers/settlers the trust service provider has domiciled in airport zones.	
4.003.000.000.000.000	International zone	These variables correspond to the number of customers/settlers the trust service provider has <u>domiciled</u> in any country other than Panama.	Natural or legal
4.003.001.000.000.000	Countries subject to United Nations (UN) sanctions	Customers/settlers that are domiciled in countries subject to UN sanctions.	
4.003.002.000.000.000	FATF-listed countries with inadequate controls	Customers/settlers that are domiciled in FATF-listed countries with inadequate controls.	
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, which are not included in the above lists and the total deposits received during the period.	
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.	

Remarks: If any of the variables (accounts) does not apply to your entity, it should not be reported. This report should not be filled out with NA or NR.



Superintendencia
de Bancos de Panamá

TRANSLATION

Remember that:

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