

April 2, 2025  
SBP-DPC-LSN-CIRCULAR-2025-0043

Mr./Ms.  
General Manager

Subject: Update on Compliance Reports Related to  
AML/CFT/FPWMD

Dear General Manager,

Concerning Circular No. SBP-DPC-LSN-0035-2023 dated May 24, 2023, we inform you that modifications have been made to the compliance reports related to AML/CFT/FPWMD. Below are the specific changes for each report:

1. **Report 1 – General Information:** A new "Comments" column has been added to the instructions, providing examples for each variable. The structure of the report has been reviewed and updated as follows:

| Added                            | Excluded             |
|----------------------------------|----------------------|
| 1. SBP Registration Resolution   | 1. Total Assets      |
| 2. MICI Authorization Resolution | 2. Total Liabilities |
| 3. Number of national employees  | 3. Total Equity      |
| 4. Number of foreign employees   | 4. Total Income      |
| 5. Number of clients             | 5. Total Expenses    |
| 6. Name of the Economic Group    |                      |

This report must be submitted semiannually, within the first ten (10) business days following the end date of each reporting period.

2. **Report 2 – Shareholding Structure and Board of Directors:** No structural changes have been made. A "Comments" column with examples has been added to the instructions. This report must also be submitted semiannually, within the first ten (10) business days after the end date of each reporting period.
3. **Report 3 – Operational Information:** No structural changes have been made. A "Comments" column with examples has been added to the instructions. This report must be submitted semiannually, within the first fifteen (15) business days following the end date of each reporting period.
4. **Report 4 – Risk Factor Identification:** This report has been updated with changes to the OSF01 form, including the addition of the "Description" and "Type of individual" columns, as well as the removal and addition of relevant variables. The overall structure of the report remains largely unchanged.

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This information must be reported semiannually and submitted no later than the 31st day of the month following the end date of each reporting period.

The cut-off dates for these reports will be June 30 and December 31 of each year. Reporting begins in July 2025, using data from the first semester of 2025, and must be submitted semiannually through the TIDSO system. The information must be submitted in Excel format.

Accordingly, to ensure the proper submission of your reports, we are attaching the following files: Compliance Reports Guide (PDF), Reference Tables for Reports (including Country, Positions - SB03, and Risk Factor Structure - OSF01 tables), and Excel templates for data entry for each report. It is important to maintain the integrity of these templates and not alter the sheet names.

This communication hereby renders Circular No. BP-DPC-LSN-0035-2023 of May 24, 2023, null and void.

Additionally, we remind you that inquiries should continue to be addressed to the following email: soporte@superbancos.gob.pa.

We kindly ask the General Manager to instruct the relevant staff to ensure this information is submitted within the deadlines established.

Best regards,

(signed)  
Milton Ayón Wong  
Superintendent

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