

TRANSLATION

Republic of Panama *Superintendency of Banks*

GENERAL RESOLUTION SBP-RG-0005-2012 (dated 30 March 2012)

THE SUPERINTENDENT OF BANKS,
in use of his legal powers, and

CONSIDERING:

That after promulgation of Decree Law 2 dated 22 February 2008, the Executive branch reordered the provisions of Decree Law 9 dated 26 February 1998 and all subsequent modifications in proper sequence as a single text approved by Executive Decree 52 dated 30 April 2008, hereinafter referred to as the Banking Law;

That pursuant to article 6 of the Banking Law, it is the duty of the Superintendency to ensure that banks maintain liquidity and solvency ratios adequate the discharge of their obligations, as well as adequate procedures for the supervision and control of their national and international activities by the Superintendency, in close collaboration with Foreign Supervisory Entities, if such were the case;

That according to article 91 of the Banking Law, it is the duty of the Superintendency to set the period and format for the submission of reports to the Superintendency of Banks;

That in accordance with the provisions of paragraph 14 of article 16 of the Banking Law, among the technical duties of the Superintendent is to establish prevention programs to allow full cognizance of the financial condition of a bank, as well as the verification of the truthfulness of the information submitted by banks to the Superintendency;

That the need and advisability of updating the information requirements referred to in General Resolution 2-2009 dated 28 October 2009, as well as, repealing the cited Resolution, has been pointed out in the working sessions of the Superintendency.

RESOLVES:

ARTICLE 1: CONTENTS, FORMAT AND FREQUENCY FOR THE SUBMITTAL OF INFORMATION TO THE SUPERINTENDENCY. The banks shall submit to the Superintendency the information referred to in:

Code	Description	Issuer	Contents	Frequency	Format	Quantity to be Submitted	Remarks
AT01	Accounting Atom	State-owned Banks, General License Banks and International License Banks	Account detail for the Financial Balance Sheet Statement, Income Statement and Off-balance Sheet Operations in accordance with the Single Account Plan (SAP) of the Superintendency	Monthly, within the first ten (10) business days of the month following the month to be reported	ITBANK	1	The information must be submitted in accordance with the framework established by the Superintendency. Reference: Paragraph 1 of Article 91 of the Banking Law.

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AT02	Deposits Atom	State-owned Banks, General License Banks and International License Banks	Detail of the deposits registered by the Bank in its books	Monthly, within the first ten (10) business days of the month following the month to be reported	ITBANK	1	The information must be submitted in accordance with the framework established by the Superintendency. Reference: Article 93 of the Banking Law; Circular No. 47-2007
AT03	Credit Atom	State-owned Banks, General License Banks and International License Banks	Detailed information on the Bank's Loan Portfolio	Monthly, within the first (10) business days of the month following the month to be reported	ITBANK	1	The information must be submitted in accordance with the framework established by the Superintendency. Reference: Paragraph 2 of Article 91 of Banking Law; Rule No. 6-2000, amended by Rules No. 5-2002 and No. 4-2003.
AT04	Acquired Assets Atom	State-owned Banks, General License Banks and International License Banks, as provided for in Rule No. 3-2009	Banks must submit the details of acquired assets in payment for pending credits that Bank registers on its books. This notification must be made once the award is duly filed with the Public Registry. The Bank shall keep the documentation in its files at the disposal of the Superintendency	Monthly, within the first ten (10) business days of the month following the month to be reported	ITBANK	1	The information must be submitted in accordance with the framework established by the Superintendency. Reference: Article 101 of the Banking Law; Rule No. 3-2009; Circulars No. 25-2009 and No. 47-2009.
AT05	Bank General Information Atom	State-owned Banks, General License Banks and International License Banks	Bank general information	Monthly, within the first ten (10) business days of the month following the month to be reported	ITBANK	1	The information must be submitted in accordance with the framework established by the Superintendency. Reference: Paragraph 3 of Article 91 of the Banking Law; Rule No. 8-2000, amended by Rule No. 10-2000; Circulars No. 36-2004, No. 37-2005, No. 20-2006, No. 41-2007, No. 45-2010, No. 37-2011; Form SB-OC-1.
AT06	Investment Instruments Atom	State-owned Banks, General License Banks and International License Banks	Detailed information on the investments the bank registers on its books (classification, provisions, etc.)	Monthly, within the first ten (10) business days of the month following the month to be reported	ITBANK	1	The information must be submitted as of the closure of March 2012, in accordance with the framework established by the Superintendency and the provisions of Circular No. 89-2011. Reference: Paragraph 2 of article 91 of the Banking Law, Rule No. 7-2000 amended by Rules No. 1-2001 and No. 5-2002, Circular No. 89-2011.
AT07	Monthly Liquidity Atom	State-owned Banks, General License Banks and International License Banks	Items included in the bank's financial liquidity	Monthly, within the first ten (10) business days of the month following the month to be reported	ITBANK	1	The information must be submitted in accordance with the framework established by the Superintendency. Reference: Articles 73 and 77 of the Banking Law and Rule No. 4-2008, amended by Rules No. 10-2009 and No. 02-2011.
AT08	Monthly Cash Atom	State-owned Banks, General License Banks and International License Banks	Statement of the Bank's monthly cash movements	Monthly, within the first ten (10) business days of the month following the month to be reported	ITBANK	1	The information must be submitted in accordance with the framework established by the Superintendency. Reference: Article 91 of the Banking Law; Rule No. 12-2005, amended by Rule No. 8-2006; Circular No. 23-2006.

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AT09	Interest Rate Atom	State-owned Banks, General License Banks and International License Banks	Reports the balances, due dates and earnings/costs of productive assets, debts that generate costs and contingency accounts	Monthly, within the first ten (10) business days of the month following the month to be reported	ITBANK	1	The information must be submitted in accordance with the framework established by the Superintendency. Reference: General Resolution No. 2-2000, amended by General Resolution No. 4-2000.
AT10	Liquidity Atom	State-owned Banks, General License Banks and International License Banks	Items included in the bank's legal liquidity	Weekly, at the closing of every Friday with a Sunday reporting deadline	ITBANK	1	The information must be submitted in accordance with the framework established by the Superintendency. Reference: Chapter VI of Title III of the Banking Law; Rule No. 4-2008, amended by Rules No. 10-2009 and No. 2-2011; Circulars No. 6-2006, No. 19-2009 and No. 10-2010.
AT11	Weekly Cash Atom	State-owned Banks, General License Banks and International License Banks	Weekly cash movements	Weekly, at the closing of every Sunday with a Wednesday reporting deadline	ITBANK	1	The information must be submitted in accordance with the framework established by the Superintendency. Reference: Article 91 of the Banking Law; Rule No. 12-2005, amended by Rule No. 8-2006 and Circular No. 23-2006.
AT12	Collateral Atom	State-owned Banks, General License Banks and International License Banks	Detailed information on collateral	Monthly, within the first ten (10) business days of the month following the month to be reported	ITBANK	1	The information must be submitted in accordance with the framework established by the Superintendency. Reference: Article 91 of the Banking Law; Circulars No. 27-2009 and No. 12-2010.
AT13	Bank Holding Companies	Bank holding companies consolidating operations with a Holding established within the Republic of Panama	Consolidated financial statement, consolidated statement of overall profits and consolidated statement of changes in equity	Quarterly, within sixty calendar days following the closure of the respective quarter	ITBANK	1	The information must be submitted in accordance with the framework established by the Superintendency.
AT14	Financial Atom of Currency Positions	State-owned Banks, General License Banks and International License Banks	Specify currency positions and value	Monthly, within the first ten (10) business days of the month following the month to be reported	ITBANK	1	The information must be submitted in accordance with the framework established by the Superintendency. Reference: Circular No. 47-2011.
AT15	Investment Instruments Atom	State-owned Banks, General License Banks and International License Banks	Detailed information on the investments on the bank's books (classification, provisions, etc.)	Monthly, within the first ten (10) business days of the month following the month to be reported	ITBANK	1	The information must be submitted in accordance with the framework established by the Superintendency. Reference: Paragraph 2 of article 91 of the Banking Law, Rule No. 7-2000 amended by Rules No. 1-2001 and No. 5-2002, Circular No. 89-2011.
BAN01	Table of Branch offices	State-owned Banks, General License Banks and International License Banks	Details of the bank's branch offices	Monthly, within the first ten (10) business days of the month following the month to be reported	ITBANK	1	The information must be submitted in accordance with the framework established by the Superintendency. Reference: Article 91 of the Banking Law; Circular No. 20-2006.
BAN02	Table of Subsidiaries	State-owned Banks, General License Banks and International License Banks	Consolidated Balance Statement and Income Statement of the banks (Consolidation Sheet)	Monthly, within thirty (30) calendar days following the month to be reported	ITBANK	1	The information must be submitted in accordance with the framework established by the Superintendency. Reference: Circulars No. 5-2006, No. 26-2007 and No. 29-2007.

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BAN03	Table of Economic Groups and Related Parties	Entities according to the provisions of Rule No. 6-2009 and the Subsidiaries or Branches of Foreign Banks for which the Superintendency is the host supervisor	Information on the Economic Banking Group, private banking and parties and related to the bank	Quarterly, within thirty (30) calendar days after the respective quarter is over	ITBANK	1	The information must be submitted in accordance with the framework established by the Superintendency. Reference: Articles 86, 95, 96 and 98 of the Banking Law; Rule No. 6-2009; Circulars No. 56-2000, No. 15-2004 and No. 15-2010.
BAN04	Table of Lending and Deposit Rates	State-owned Banks and General License Banks	Established interest rates (nominal, not average) by credit sectors and terms for time deposits	Monthly, within the first ten (10) business days of the month following the month to be reported	ITBANK	1	The information must be submitted in accordance with the framework established by the Superintendency. Reference: Paragraph 3 of Article 91 of the Banking Law; Circular No. 45-2002.
BAN05	Table of Capital Adequacy	State-owned Banks, General License Banks and International License Banks for which the Superintendency of Banks of Panama is home supervisor. The branches of Foreign Banks holding General Licenses, Foreign Subsidiaries holding International Licenses or branches of Foreign Banks holding International License should not file this report	The bank's Risk-weighted assets and consolidated equity	Quarterly, within thirty (30) calendar days after the relevant quarter is over	ITBANK	1	The information must be submitted in accordance with the framework established by the Superintendency. Reference: Rule No. 5-2008, amended by Rule No. 4-2009; Circular No. 37-2006.
BAN06	Table of Off-balance Operations	State-owned Banks, General License Banks and International License Banks	Classification and provisions of Off-balance operations (specifically Contingent Operations)	Monthly, within the first ten (10) business days of the month following the month to be reported	ITBANK	1	The information must be submitted in accordance with the framework established by the Superintendency. Reference: Rule No. 6-2002.
BAN07	Assets acquired by the bank and its Subsidiaries	State-owned Banks, General License Banks, International License Banks, as provided for in Rule No. 3-2009. Banks will report for their Subsidiaries.	Acquisition of real property in payment for insolvent loans, in any method, within thirty (30) days following registration in the Public Registry	Monthly, within thirty (30) calendar days following of the month after the month to be reported	ITBANK	1	The information must be submitted in accordance with the framework established by the Superintendency. Reference: Article 101 of the Banking Law; Rule No. 3-2009; Circulars No. 25-2009 and No. 47-2009.
BAN09	Derivatives	State-owned Banks, General License banks and International License Banks	Detailed information on derivatives on the bank's books	Monthly, within the first ten (10) business days of the month following the month to be reported	ITBANK	1	The information must be submitted in accordance with the framework established by the Superintendency. Reference: Circular No. 90-2011.
EVAP	Framework of Past Due Assets and Liabilities	State-Owned and General License Banks	Detail of past due assets and liabilities making up the liquidity portfolio	Weekly, at the closing of every Friday with a Sunday reporting deadline	ITBANK	1	The information must be submitted in accordance with the framework established by the Superintendency. Reference: Paragraph 3 of Article 76, Articles 91 and 93 of the Banking Law; Circulars No. 60-2008 and No. 10-2010.

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ADECAP	Capital Adequacy (Annual Certification)	The branches of Foreign Banks holding General Licenses and International Licenses Banks subject to host supervision must submit an Annual Certification	Certification given by the Supervisory Body's or Parent Company's External Auditors	Annually, within three (3) months following the closure of the bank's fiscal year	Printed	1	Reference: Rule No. 5-2008.
EFA	Audited Financial Statements	State-owned Banks, General License Banks and International License Banks	Audited financial statements with their respective explanatory notes and affidavits pursuant to the provisions of Rule No. 1-2010	Annually, within three (3) months following the closure of the bank's fiscal year	Printed	2	Reference: Article 87 of the Banking Law and Rule No. 1-2010.
EFS	Reviewed/Audited Semi-annual Comparative Financial Statements of Economic Groups	State-owned Banks, General License banks and International License Banks	Reviewed/Audited Financial Statements with their respective explanatory notes	In the case of Reviewed Statements, Semi-annually, sixty (60) calendar days following the closure of the semester. In the case of Audited Statements, Semi-annually, ninety (90) calendar days following the end of the bank's fiscal period	Printed	2	The semi-annual Financial Statement not matching with the fiscal closure must be submitted unaudited with the reviewed opinion of the Holding Company's audit firm. The branches of Foreign General and International License Banks must submit the consolidated Financial Statements of their Parent Companies. Reference: Article 86 of the Banking Law and Circular No. 14-2001.
EFT	Unaudited Quarterly Consolidated Financial Statements of the bank	State-owned Banks, General License Banks and International License Banks	Interim consolidated financial statements with their respective explanatory notes	Quarterly, within thirty (30) calendar days following the end of each quarter	Printed	2	If the bank does not consolidate reports, it must submit the financial statements of the bank in Panama. Articles 89 and 90 of the Banking Law. This shall be submitted in accordance with Circulars No. 30-2001 and No. 32-2003 and must include consolidated forms A, B, C, D, E, and F; Circulars No. 64-2000 and No. 4-2005.
SB-CAP-A	Form "A"	State-owned Banks, General License Banks and International License Banks	Report on the maturity profile of the credit portfolio by type of loan and compliance with payment	Quarterly, within thirty (30) calendar days following the end of each quarter	Printed	1	The bank must not submit this form if the information that must be registered is already included in the notes of the interim (EFT) and audited (EFA) financial statements. If the information concerning the end of the fiscal period is not included in the notes of the audited financial statements (EFA), then this form must be submitted signed and approved by the audit firm. Reference: Circulars No. 64-2000, No. 30-2001 and No. 32-2003.

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SB-CAP-B	Form "B"	State-owned Banks, General License Banks and International License Banks	Report on the maturity profile of current loans according to the remaining contracted period	Quarterly, within thirty (30) calendar days following the end of each quarter	Printed	1	<p>The bank must not submit this form if the information that must be registered is already included in the notes of the quarterly interim (EFT) and audited (EFA) financial statements.</p> <p>If the information concerning the end of the fiscal period is not included in the notes of the audited financial statements (EFA), then this form must be submitted signed and approved by the audit firm.</p> <p>Reference: Circulars No. 64-2000, No. 30-2001 and No. 32-2003.</p>
SB-CAP-C	Form "C"	State-owned Banks, General License Banks and International License Banks	Report on the age of the past due portfolio	Quarterly, within thirty (30) calendar days following the end of each quarter	Printed	1	<p>The bank must not submit this form if the information that must be registered is already included in the notes of the quarterly interim (EFT) and audited (EFA) financial statements.</p> <p>If the information concerning the end of the fiscal period is not included in the notes of the audited financial statements (EFA), then this form must be submitted signed and approved by the audit firm.</p> <p>Reference: Circulars No. 64-2000, No. 30-2001 and No. 32-2003.</p>
SB-CAP-D	Form "D"	State-owned Banks, General License Banks and International License Banks	Report on the loan portfolio by type and classification category	Quarterly, within thirty (30) calendar days following the end of each quarter	Printed	1	<p>The bank must not submit this form if the information that must be registered is already included in the notes of the quarterly interim (EFT) and audited (EFA) financial statements.</p> <p>If the information concerning the end of the fiscal period is not included in the notes of the audited financial statements (EFA), then this form must be submitted signed and approved by the audit firm.</p> <p>Reference: Circulars No. 64-2000, No. 30-2001 and No. 32-2003.</p>
SB-CAP-E	Form "E"	State-owned Banks, General License Banks and International License Banks	Report on the detail of provisions, by type and classification category of the credit portfolio	Quarterly, within thirty (30) calendar days following the end of each quarter	Printed	1	<p>The bank must not submit this form if the information that must be registered is already included in the notes of the quarterly interim (EFT) and audited (EFA) financial statements.</p> <p>If the information concerning the end of the fiscal period is not included in the notes of the audited financial statements (EFA), then this form must be submitted signed and approved by the audit firm.</p> <p>Reference: Circulars No. 64-2000, No. 30-2001 and No. 32-2003.</p>

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SB-CAP-F	Form "F"	State-owned Banks, General License Banks and International License Banks	Control of loans over 90 days in arrears	Quarterly, within thirty (30) calendar days following the end of each quarter	Printed	1	<p>The bank must not submit this form if the information that must be registered is already included in the notes of the quarterly interim (EFT) and audited (EFA) financial statements.</p> <p>If the information concerning the end of the fiscal period is not included in the notes of the audited financial statements (EFA), then this form must be submitted signed and approved by the audit firm.</p> <p>Reference: Circulars No. 64-2000, No. 30-2001 and No. 32-2003.</p>
OFAC List	Certification of the Revision of OFAC List	State-owned Banks, General License Banks and International License Banks	Proof of the Bank's monthly revision of the OFAC Internet site	Monthly, within the first ten (10) business days of the month following the month to be reported	E-mail	1	Reference: Circular No. 13-2002.
SBP-DAE-01	Notice of the Bank's Contracting of External Auditors	State-owned Banks, General License Banks, International License Banks and holding companies of banking groups for which the Superintendency is the home supervisor	Name of the appointed External Auditing Firm	Within seven (7) calendar days following the appointment	Printed	1	Reference: Rules No. 4-2010 and No. 9-2010; Circulars No. 67-2010 and No. 29-2012.
SBP-DAE-02	Detailed information on the Bank's External Audit Team	State-owned Banks, General License Banks, International License Banks and holding companies of banking groups for which the Superintendency is the home supervisor	Name of the external auditors and detail of members of the audit team, as well as any other changes to the team	Within sixty (60) days prior to the beginning of the annual audit	Printed	1	Reference: Rules No. 4-2010 and No. 9-2010; Circular No. 29-2012.
IRM	Report of the External Auditors on the Internal Control-Market Risk	State-owned Banks, General License Banks and International License Banks	Report of the external auditors on the internal control – Market Risk	Annually, within three months following the concerning end of the bank's fiscal year	Printed	1	Reference: Rule No. 5-2001.
IEA	Report of the External Auditors	State-owned Banks, General License Banks and International License Banks	Report of the external auditors pursuant to Art. 9 of Rule No. 4-2010	Annually, within three months following the concerning end of the bank's fiscal year	Printed	1	Reference: Article 87 of the Banking Law; Article 9 of Rule No. 4-2010. General Resolution No. 001-2011.
CGAE	Letter to Top Management issued by the External Auditors	State-owned Banks, General License Banks and International License Banks	Letter to Top Management issued by its external auditors, copy of the action plan with corrective measures, representation letter and copy of the audit discrepancy sheet	Annually, one-hundred twenty days following the end of the bank's fiscal year	Printed	1	Reference: Rule No. 4-2010; Circular No. 41-2011.

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SB-CUIN	Report on Dormant Accounts and Securities	State-owned Banks, General License Banks and International License Banks	Accounts and securities that have been inactive for over 5 years belonging to clients whose whereabouts are unknown	Quarterly, within ten (10) business days following the end of each quarter	Printed	1	Reference: Article 215 of the Banking Law; Circular No. 39-2004, Rule No. 5-2009.
IF01	CAS (Complaints Attention System) Claims	State-owned Banks, General License Banks	Claims received and handled by CAS	Quarterly, within ten (10) business days following the end of each quarter	ITBANK	1	Reference: Chapter IV of Title VI of the Banking Law; Rule No. 3-2008 and Circular No. 20-2010.
CCR	Contracting of Credit Risk Rating Agencies	New General License or International License Banks	Notice of the Contracting of the desired Credit Risk Rating Agency, with the prior approval of the Board of Directors	30 days following approval by the Board of Directors	Printed	1	Reference: Rule No. 2-2010, amended by Rule No. 6-2010.
CDR	Credit Risk Rating	State-owned Banks, General License Banks and International License Banks	Copy of the Credit Risk Rating published in a newspaper with nationwide circulation	Within five days following the publication	Printed	1	Reference: Rule No. 2-2010, Circulars No. 25-2010 and No. 45-2011.
LGP	Overall Loss Limit	State-owned Banks, General License Banks and International License Banks	Maximum cumulative limit for realized and unrealized net losses in the investment portfolio and secured liabilities portfolio	Annually, within thirty days following the end of the bank's fiscal year	Printed	1	Reference: Rule No. 5-2001; Circular no. 58-2008.
CDC	Compliance Certification	State-owned Banks, General License Banks and International License Banks to whom the Superintendency is the home supervisor	Board of Directors' Compliance Certification	Annually, within sixty days following the end of the bank's fiscal year	Printed	1	Reference: Rule No. 8-2010.
RFCE	Report of Fraud in Electronic Channels	State-owned Banks, General License Banks and International License Banks	Encrypted report of events or attempted fraud that were detected in electronic channels through the information systems, actions to prevent them and evidence that banks potentially affected have been warned	Within five business days following the date the bank became aware of the event	E-mail	1	Reference: Circulars No. 63-2010 and No. 16-2011.
GC	Corporate Governance (Annual Certification)	Branches of Foreign Banks and International License Banks subject to supervision	Certification issued by the Parent Company or responsible Regional Office	Annually, within three (3) months following the concerning end of the bank's fiscal year	Printed	1	Reference: Rule No. 5-2011.
CA	Audit Committee (Annual Certification)	Branches of Foreign Banks	Certification issued by the Chairman of the Audit Committee of the Parent Company	Annually, within three (3) months following the concerning closure of the bank's fiscal period	Printed	1	Reference: Rule No. 4-2010
PRP	Provision for Country Risk (Annual Certification)	Branches of Foreign Banks holding a General License or an International License	Certification issued by the external auditors of the Parent Company and/or by the relevant Supervisory Body	Annually, within three (3) months following the end of the bank's fiscal year	Printed	1	Reference: General Resolution No. 7-2000.

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PBE	Provisions by Foreign Banks (Annual Certification)	In case of branches of Foreign Banks holding a General License or an International License	Certification issued by the external auditors of the Parent Company and/or by the relevant Supervisory Body	Annually, within three (3) months following the end of the bank's fiscal year	Printed	1	Reference: Rule No. 6-2000.
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PARAGRAPH 1: If a due date falls on a holiday, it is understood that it is extended until the next business day.

PARAGRAPH 2. The information submitted by the banks to the Superintendency through the Atoms and BAN Charts or electronically, must be prepared and certified pursuant to the provisions of the Banking Law, Rules, Resolutions and Circulars in force as of the date the information is submitted to the Superintendency.

PARAGRAPH 3: The Superintendency of Banks may establish new parameters regarding the frequency and/or the format for submitting information contained herein at any time.

ARTICLE 2: CORRECTIONS TO THE INFORMATION ALREADY SUBMITTED TO THE SUPERINTENDENCY. Any correction made by the bank, to the information sent in previous periods, that has been detected and informed by the Superintendency; as well as any adjustments that are required to be made during the current month, must be made no later than the end of the following monthly period.

In the case of adjustments or reclassifications concerning the end of the fiscal year and related to audited information, the correction made by the bank must be submitted within ten (10) business days after the three (3) months established by Law.

ARTICLE 3: QUALITY OF INFORMATION. The information submitted by the banks to the Superintendency through Atoms and BAN Charts, printed or electronically, must be duly prepared and certified by the manager of the relevant operating area. Therefore, it is the bank's responsibility to ensure that there are no inconsistencies or mistakes between the information kept in the bank's files and the submitted information, in order to meet each one of the parameters established in the provisions that regulate the framework and submittal of information to the Superintendency.

ARTICLE 4: SANCTIONS. Violations of the provisions on framework, certification, accuracy and submittal of the information set forth in the Banking Law, Rules, Resolutions and Circulars, as well as non-compliance by failure to submit information or by the submittal of erroneous data shall be punished pursuant to the provisions contained in Title IV of the Banking Law.

ARTICLE 5: REPEAL. This General Resolution rescinds the General Resolution No. 2-2009 dated 28 October 2009.

ARTICLE 6: ENACTMENT. This General Resolution shall become effective upon its promulgation.

Given in the city of Panama, on the thirtieth (30th) day of March, two thousand twelve (2012).

LET IT BE KNOWN, PUBLISHED AND ENFORCED.

THE SUPERINTENDENT OF BANKS,

Alberto Diamond R.