

INSTRUCTIONS MANUAL FOR FILLING OUT THE STATISTICAL INFORMATION FORM RELATED TO FINANCE, LEASING AND FACTORING COMPANY RISK OF MONEY LAUNDERING, THE FINANCING OF TERRORISM AND FINANCING THE PROLIFERATION OF WEAPONS OF MASS DESTRUCTION

The Statistical Information Form required by the Superintendency is for the risk of money laundering, the financing of terrorism and financing the proliferation of weapons of mass destruction, hereinafter referred to AML/CFT/WMD, which is comprised of an Excel file with six (6) calculation sheets, as follows:

1. Affidavit;
2. Structural and Financial information;
3. Customer risk information;
4. Products and services risk information;
5. Distribution channel risk information; and
6. Geographical area risk information.

The information request is to be submitted on a semi-annual basis. The closing dates will be June 30 and December 31 of each year. The information must be submitted to the Superintendency of Banks of Panama by the 31st day of the month following the closing date of each period.

When filling out the information required in the form, please bear in mind the following:

- Fill out only the cells in gray color
- The amounts must be recorded in the local currency (Balboas [B/.]) without periods, commas or currency symbols
- The file structure must not be added to, deleted or modified
- The date format must be DD/MM/YYYY
- The cells requiring quantities must be filled out without periods, commas or text

I. **AFFIDAVIT:**

- Legal grounds: - Law 23 dated 27 April 2015 and
- Rule 5-2015 dated 26 May 2015

It is of the utmost importance to give warning that the information described herein is legally binding institutionally on the reporting entity and personally on the persons reporting this information to the authority.

In that sense, the Finance, Leasing or Factoring company hereby certifies that the affidavit and information in the form are true and accurate and authorizes the Superintendency of Banks of Panama to use them for the purposes of monitoring and supervision. This affidavit must state the name and position of the person filling out the document and also the name of the Compliance Officer certifying the truthfulness of the reported information.

1. Report date (DD/MM/YYYY): The date the report is made to this authority. (DD/MM/YYYY format).
2. Report closing date (DD/MM/YYYY): **For one time only** and in order to have information on two (2) different periods, this Statistical Information Form for AML/FT/WMD risk **initially must be submitted for the two semi-annual closing dates of 2016:**

First Report or Document 1. The information report closing date will be **June 30, 2016**. However, for the transactions (Fees), the **period between January 1 and June 30, 2016** must be considered.

Second Report or Document 2. The information report closing date will be **December 31, 2016**. However, for the transactions (Fees) the **period between July 1 and December 31, 2016** must be considered.

Subsequently, the reports will be governed by the required reporting dates:

“This information request will be submitted on a semi-annual basis. The closing dates will be June 30 and December 31 of each year. The information must be submitted to the Superintendency of Banks of Panama by the 31st day of the month following the closing date of each period.”

II. GENERAL INFORMATION

A. REGULATED ENTITY'S GENERAL DATA

The general data on the finance, leasing or factoring company as described below is required:

1. Name of the entity: The name of the entity as registered in the Ministry of Commerce and Industry.
2. Entity's code according to the SBP: code assigned by the Superintendency's Prevention and Control of Illicit Operations.
3. Registration date (DD/MM/YYYY): Dated in which the company was registered in the Ministry of Commerce and Industry.

4. RUC N°: Tax Identification Number.
5. Physical address: Headquarters physical location.
6. Compliance Officer's contact telephone: company telephone number for contacting the Compliance Officer directly.
7. Website: Indicate the entity's website, if applicable.
8. Date of commencement of operations (DD/MM/YYYY): The date of commencement of operations.

B. STRUCTURAL AND FINANCIAL INFORMATION OF THE REGULATED ENTITY

1. List of the main shareholders: Indicate the name, identification card number and nationality of the shareholders with a share over 10%. It is necessary to identify the individual beneficiaries that are represented through legal entities.
2. Legal representative: Indicate the legal representative's name, identification card number and nationality.
3. Total employees: Indicate the total number of entity employees, regardless of the type of relationship (appointed, recruited, etc.).
4. Compliance Officer's Name: Indicate the Compliance Officer's name.
5. Total number of personnel in the Compliance Structure: Number of people working in the AML/CFT/WMD unit/area.
6. Monitoring tool name: Name of the tool the entity uses in the prevention of ML/CFT/WMD risk.
7. Monitoring tool version: If the previously listed tool has different versions, please list the version the entity currently uses.
8. Monitoring tool implementation date: (DD/MM/YYYY) Date in which the entity started using the monitoring tool.
9. Date of last upgrade of the monitoring tool: (DD/MM/YYYY) Date of the last upgrade of the monitoring tool.
10. Monitoring tool supplier: Indicate the name of the monitoring tool supplier, if applicable.

11. Total red flags generated during the reporting period: The number of red flags generated during the reporting period.
12. FAU registration date: The date in which the entity was registered with the FAU.
13. Total number of Suspicious Transaction Reports during the period: Number of STR submitted to the FAU during the reporting period.
14. Cash Transaction Reports (CTR) during the period:
 - 14.1. Quantity: Number of Cash Transaction Reports within the reporting period.
 - 14.2. Amount: Total value of the cash transaction reports during the reporting period.
15. Total assets: Corresponds to the total assets on the cut-off date.
16. Total liabilities: Corresponds to the total liabilities on the cut-off date.
17. Total equity: Corresponds to the total equity on the cut-off date.
18. Total income: Corresponds to the total income on the cut-off date.
19. Total expenses: Corresponds to the total expenses on the cut-off date.

C. INFORMATION ON THE RISK FACTORS

I. CUSTOMER RISK INFORMATION:

The information on the number of clients and the transactional volume – value of the credits or financing on the cut-off date – is required on the type of clients indicated below

1. Customers identified as Individuals:
 - 1.1. Total Nationals: Applies to customers holding Panamanian nationality.
 - 1.2. Total Foreigners: Applies to customers holding foreign nationality.
2. Customers classified as Legal entities

- 2.1. Total Nationals: Applies to customers classified as legal entities incorporated in Panama.
- 2.2. Total Foreigners: Applies to customers classified as legal entities incorporated abroad.
- 2.3. Bearer share customers: Applies to customers who are legal entities all or part of whose shares are bearer shares. This does not include customers whose issued share package consists only of registered shares.
- 2.4. Customers classified as private interest foundations: Applies to customers identified as private interest foundations.
- 2.5. Customers classified as nonprofit foundations: Applies to customers identified as nonprofit foundations.
- 2.6. Customers identified as Not-for-profit Organizations (NPO): Applies to customers identified as Not-for-profit organizations (NPO).
- 2.7. Customers with contractual relationships with the Government: Applies to customers having contracts with the Government.
3. Customers classified as Politically Exposed Persons (PEP)
 - 3.1. Nationals: Applies to customers the entity has classified as Panamanian PEP.
 - 3.2. Foreigners: Applies to customers the entity has classified as Foreign PEP.
4. Other customer classification
 - 4.1. Customers located in free trade areas: Total number of customers running operations through a free trade area.
 - 4.2. Trust fund Customers: Customers resulting from trust fund agreements.
5. Customers classified by risk by the entity
 - 5.1. High: Applies to customers the entity has classified as high risk.
 - 5.2. Medium: Applies to customers the entity has classified as medium risk.

5.3. Low: Applies to customers the entity has classified as low risk.

II. PRODUCTS AND SERVICES RISK INFORMATION:

The number of customers and the transactional volume – balance of loans and financing – are required for the products and services risk information listed below.

Lending Products

1. High-risk lending products:

1.1. Loans: These fields correspond to the following disbursement categories:

1.1.1. Consumer: Corresponds to the number and balances of loans/ financing for the consumer loan portfolio.

1.1.2. Commercial: Corresponds to the number and balances of loans/ financing for the commercial loan portfolio.

1.1.3. Mortgage: Corresponds to the number and balances of loans/financing for the mortgages portfolio.

1.2. Leasing: These fields correspond to the following leasing operations:

1.2.1. Operating: Corresponds to the number and balances of loans/ financing for the operational leasing portfolio.

1.2.2. Financial: Corresponds to the number and balances of loans/financing for the financial leasing portfolio.

1.2.3. Real estate: Corresponds to the number and balances of loans/ financing for the real estate leasing portfolio.

1.2.4. Cars: Corresponds to the number and balances of loans/financing for the cars leasing portfolio.

1.2.5. Others: Corresponds to the number and balances of loans/financing for a portfolio other than those mentioned in 1.2.1 through 1.2.4.

1.3. Factoring: These fields correspond to the following factoring operations:

1.3.1. With recourse: Corresponds to the portfolio of customers that have sold their invoices and the customer guarantees payment of the debt. The number of loans/financing and balances on the cut-off date are required.

1.3.2. Without recourse: Corresponds to the portfolio of customers that have sold their invoices and the customer does not guarantee payment of the debt. The number of loans/financing and balances on the cut-off date are required.

Deposit products

2. High-risk deposit products:

2.1. Issuance of securities (bonds, others)

2.1.1. Public issues: Corresponds to customers holding the entity's publicly issued securities as debt. The number of customers and the value of the securities placed are required.

2.1.2. Private issuance: Corresponds to customers holding the entity's privately issued securities as debt. The number of customers and the value of the securities placed are required.

2.2. Received funding: Total value of the financing received through financial and nonfinancial entities.

Services by Risk

3. High-risk services identified by the Regulated Entity: The regulated entity is required to list identified high-risk services that resulted from its AML/CFT/WMD risk analysis. For this purpose, list the services from highest (field 3.1) to lowest (field 3.5), providing the number of customers and the amount of the fees for those services.

III. INFORMATION ON DISTRIBUTION CHANNEL RISK:

The number of customers and the transactional volume through the channels described below are required for the information on distribution channel risk:

1. Agreements and/or alliances for the development of products through:

1.1. Entities of the Group to which it belongs: Number of customers referred by other entities of the group and the balance of the loans/financing of contracts on the cut-off date.

1.2. Agreements and/or contracts with third parties: Number of customers referred by entities not members of the group to which it belongs, as well as the balance of loans/financing of contracts on the cut-off date.

2. Others:

2.1. Describe other channels identified by the entity: The name of the channel or channels and the respective transactional amounts (debits and credits) in other distribution channels are required for the risk information on other distribution channels.

IV. INFORMATION ON GEOGRAPHIC ZONE RISK:

The information on the number of customers and the transactional volume – balance of loans and financing – for the provinces listed below are required for the information on geographic zone risk:

1. (Panamanian) domestic zone: These variables correspond to the number of customers the entity has in the branch offices located in these provinces. Additionally, taking into consideration the risk classification adopted by the entity, please choose the appropriate risk level (high, medium, low) for each of the national geographic zones listed in 1.1 through 1.10

- 1.1. Province of Bocas del Toro
- 1.2. Province of Coclé
- 1.3. Province of Colón
- 1.4. Province of Chiriquí
- 1.5. Province of Darién
- 1.6. Province of Herrera
- 1.7. Province of Los Santos
- 1.8. Province of Panamá
- 1.9. Province of Veraguas
- 1.10. Province of Panamá Oeste

2. International zone: Corresponds to the domiciliary country declared by the customer.

- 2.1. **Jurisdictions subject to United Nations (UN) sanctions:** Corresponds to customers domiciled in countries subject to UN sanctions. Requires the name of the country, the number of customers and the total value of the loans/financing.
- 2.2. **Countries listed by the FATF due to control failure:** Corresponds to customers domiciled in countries subject to FATF sanctions. Requires the name of the country, the number of customers and the total value of the loans/financing.
- 2.3. **Other high-risk countries according to the analysis conducted by the entity:** Corresponds to customers domiciled in other countries designated high-risk by the entity and not on the previous lists. Requires the name of the country, the number of customers and the total value of the loans/financing.

Please remember that:

1. The information must be submitted digitally in Excel format via e-mail (soporte@superbancos.gob.pa)
2. Any inquiries about this requirement should be submitted via e-mail (soporte@superbancos.gob.pa)