

Anti-Money Laundering Questionnaire

Financial Institution: **Banco Financiero del Perú**

Location: **Av. Ricardo Palma 278. Miraflores. Lima – Perú.**

I. General AML Policies, Practices and Procedures		Yes	No
1.	Is the AML compliance program approved by the FI's Board or a senior committee?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
2.	Does the FI have a legal and regulatory compliance program that includes a designated officer that is responsible for coordinating and overseeing the AML framework?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
3.	Has the FI developed written policies documenting the processes that they have in place to prevent, detect and report suspicious transactions?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
4.	In addition to inspections by the government supervisors/regulators, does the FI client have an internal audit function or other independent third party that assesses AML policies and practices on and regular basis?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
5.	Does the FI have a policy prohibiting accounts/relationships with shell banks (A shell bank is defined as a bank incorporated in a jurisdiction in which it has no physical presence and which is unaffiliated with a regulated financial group.)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
6.	Does the FI have polices to reasonably ensure that they will not conduct transactions with or on behalf of shell banks through any of its accounts or products?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
7.	Does the FI have policies covering relationships with politically exposed persons (PEP'S) their family and close associates?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
8.	Does the FI have appropriate record retention procedures pursuant to applicable law?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
9.	Are the FI's AML policies and practices being applied to all branches and subsidiaries of the FI both in the home country and in locations outside of that jurisdiction?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
II. Risk Assessment		Yes	No
10.	Does the FI have a risk-based assessment of its customer base and their transactions?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
11.	Does the FI determine the appropriate level of enhanced due diligence necessary for those categories of customers that the FI has reason to believe pose a heightened risk of illicit activities at or through the FI?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
III. Know Your Customer, Due Diligence and Enhanced Due Diligence		Yes	No
12.	Has the FI implemented processes for the identification of those customers on whose behalf it maintains or operates accounts or conduct transactions?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
13.	Does the FI have a requirement to collect information regarding its customers' business activities?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
14.	Does the FI assess its FI customers' AML policies or practices?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
15.	Does the FI have a process to review and, where appropriate, update customer information relating to high risk client information?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
16.	Does the FI have procedures to establish a record for each customer noting their respective identification documents and Know Your Customer Information?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
17.	Does the FI complete a risk-based assessment to understand the normal and expected transactions of its customers?	<input checked="" type="checkbox"/>	<input type="checkbox"/>

IV. Reportable Transactions and Prevention and Detection of Transactions with Illegally Obtained Funds		Yes	No
18.	Does the FI have policies or practices for the identification and reporting of transactions that are required to be reported to the authorities?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
19.	Where cash transaction reporting is mandatory, does the FI have procedures to identify transactions structured to avoid such obligations?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
20.	Does the FI screen customers and transactions against lists of persons, entities or countries issued by government/competent authorities?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
21.	Does the FI have policies to reasonably ensure that it only operates with correspondent banks that possess licenses to operate in their countries of origin?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
22.	Does the FI adhere to the Wolfsberg Transparency Principles and the appropriate usage of the SWIFT MT 202/202 COV and MT 205/205 COV message formats? ^{1/}	<input checked="" type="checkbox"/>	<input type="checkbox"/>
V. Transaction Monitoring		Yes	No
23.	Does the FI have a monitoring program for unusual and potentially suspicious activity that covers funds transfers and monetary instruments (such as travelers checks, money orders, etc.)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
VI. AML Training		Yes	No
24.	Does the FI provide AML training to relevant employees that includes: <ul style="list-style-type: none"> • Identification and reporting of transactions that must be reported to government authorities. • Examples of different forms of money laundering involving the FI's products and services. • Internal policies to prevent money laundering? 	<input checked="" type="checkbox"/>	<input type="checkbox"/>
25.	Does the FI retain records of its training sessions including attendance records and relevant training materials used?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
26.	Does the FI communicate new AML related laws or changes to existing AML related policies or practices to relevant employees?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
27.	Does the FI employ third parties to carry out some of the functions of the FI?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
28.	If the answer to question 27 is yes, does the FI provide AML training to relevant third parties that includes: <ul style="list-style-type: none"> • Identification and reporting of transactions that must be reported to government authorities. • Examples of different forms of money laundering involving the FI's products and services. • Internal policies to prevent money laundering. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>

VII. Additional Information about of Compliance																			
i) Country Regulatory Information		Yes	No																
29.	Is the FI subject to external auditing and control by a supervisory body with regards to combating money laundering in domestic units?	<input checked="" type="checkbox"/>	<input type="checkbox"/>																
30.	What is the name of the supervisory body? How often does the supervisory body audit the FI? <u>Superintendencia de Banca, Seguros y AFP</u> <u>Annually.</u>																		
31.	How often does the external entity audit the FI? <u>Annually.</u>																		
32.	Does FI report transactions involving unusual or suspicious activities to the authorities?	<input checked="" type="checkbox"/>	<input type="checkbox"/>																
33.	To what authorities does the FI report unusual or suspicious activities? <u>Superintendencia de Banca, Seguros y AFP – Unidad de Inteligencia Financiera</u>																		
34.	Has your country established laws designed to prevent money laundering and terrorist financing?	<input checked="" type="checkbox"/>	<input type="checkbox"/>																
35.	If the answer to question 34 is yes, please list the names of your country's relevant laws below: <ul style="list-style-type: none"> • <u>Resolution SBS 6561-2009.</u> • <u>Law N° 27765: Law against Money Laundering.</u> • <u>Law N° 27693: that create the “Unidad de Inteligencia Financiera”, modified by the Law N° 28306.</u> 																		
36.	Has your institution had any regulatory or criminal enforcement actions resulting from violations of AML laws or regulations in the past five years?	<input type="checkbox"/>	<input checked="" type="checkbox"/>																
ii) General Information																			
37.	Phone number: <u>(511) 6122000</u>																		
38.	Web site: <u>www.financiero.com.pe</u>																		
39.	Swift: <u>FINAPEPL</u>																		
40.	Tax identification number: <u>20100105862</u>																		
41.	Number of Employees: <u>2079</u>																		
42.	Number of Branches: <u>79</u>																		
43.	Licence: <u>Resolución S.B.S N° 698-86 (November 25, 1986), granted by Superintendencia de Banca, Seguros y AFP</u>																		
44.	Ownership distribution above 5%: <table border="1" style="margin-left: 40px;"> <thead> <tr> <th><u>Name</u></th> <th><u>Country</u></th> <th><u>%</u></th> </tr> </thead> <tbody> <tr> <td><u>Banco del Pichincha C.A.</u></td> <td><u>Ecuador</u></td> <td><u>46.50%</u></td> </tr> <tr> <td><u>Pichincha Holding</u></td> <td><u>Estados Unidos</u></td> <td><u>38.02 %</u></td> </tr> </tbody> </table>	<u>Name</u>	<u>Country</u>	<u>%</u>	<u>Banco del Pichincha C.A.</u>	<u>Ecuador</u>	<u>46.50%</u>	<u>Pichincha Holding</u>	<u>Estados Unidos</u>	<u>38.02 %</u>									
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45.	Principal Board of Directors: <table border="1" style="margin-left: 40px;"> <thead> <tr> <th><u>Name</u></th> <th><u>Title</u></th> </tr> </thead> <tbody> <tr> <td><u>Jorge Gruenberg</u></td> <td><u>President of the Board</u></td> </tr> <tr> <td><u>Fidel Egas Grijalva</u></td> <td><u>Vice President of the Board</u></td> </tr> <tr> <td><u>Juan Pablo Egas Sosa</u></td> <td><u>Director</u></td> </tr> <tr> <td><u>Drago Kisic Wagner</u></td> <td><u>Director</u></td> </tr> <tr> <td><u>Roberto Nesta Brero</u></td> <td><u>Director</u></td> </tr> <tr> <td><u>Mauricio Pinto Mancheno</u></td> <td><u>Director</u></td> </tr> <tr> <td><u>Renato Vásquez Costa</u></td> <td><u>Director</u></td> </tr> </tbody> </table>	<u>Name</u>	<u>Title</u>	<u>Jorge Gruenberg</u>	<u>President of the Board</u>	<u>Fidel Egas Grijalva</u>	<u>Vice President of the Board</u>	<u>Juan Pablo Egas Sosa</u>	<u>Director</u>	<u>Drago Kisic Wagner</u>	<u>Director</u>	<u>Roberto Nesta Brero</u>	<u>Director</u>	<u>Mauricio Pinto Mancheno</u>	<u>Director</u>	<u>Renato Vásquez Costa</u>	<u>Director</u>		
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