

BLADEX

COMPLIANCE

CORPORATE POLICY

**FOR THE PREVENTION OF
MONEY LAUNDERING,
THE FINANCING OF TERRORISM
AND THE FINANCING
OF THE PROLIFERATION OF
WEAPONS OF MASS DESTRUCTION**

AML/CFT/CFPWMD

November 2018

Policy
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I. INTRODUCTION

Bladex is a supranational institution, focusing on financing foreign trade in and the regional integration of Latin America.

The Bank's Customer Base consists of commercial banks, state-owned entities and private sector corporations in the Region. The Bank does not provide any products or services to individual persons.

The Bank, including its Board of Directors and all of its Staff, is committed, as an Organization, to comply with all the local and international laws, regulations and guidelines established for preventing Money Laundering, the Financing of Terrorism and the Financing of the Proliferation of Weapons of Mass Destruction that apply to Bladex, its subsidiaries and the New York Agency, hereinafter referred to as "**Anti-Money Laundering**" or "**AML**". For that, the Bank has established policies and procedures in line with the specific risk profile of its products, services, customers and geographic location.

The Bank has established, within its organizational structure, an independent Compliance Area that is responsible for implementing the necessary policies and procedures needed for enabling the Bank to faithfully comply with its obligations and internal policies related to "Anti-Money Laundering" regulations in the Republic of Panama, the United States of America as well as in any other country where Bladex may operate.

The Compliance Area has developed a "Know your Customer" Policy, for understanding and defining the specific risk profile of its Customers and Products, as well as procedures for monitoring transactions that will make it possible to understand the nature of the transactions and to identify any possible suspicious operations. Together with the different other Departments at the Bank, they have also identified the key controls that enable the Organization to mitigate the risks that are inherent to the business and to comply with all external rules and internal policies.

The Policies defined following herein set forth the criteria approved by the Bank's Board of Directors. They shall be considered as the minimum framework of action through which the Bank will apply the principles of reasonably Knowing each Customer with whom we have a contractual or business relationship. Those policies are developed and reflected in detailed procedures and processes for each case that so warrants it, pursuant to the requirements of each jurisdiction. These Policies must be reviewed and approved by the Board of Directors at least once every year.

In order to be successful in implementing the "Know your Customer Policy" and the "Anti-Money Laundering" Policy, the cooperation of all of the Bank's Employees is required. Therefore, it is

necessary to be diligent, both when signing up a new Customer as well as when reviewing each of the transactions, especially those considered to be high-risk.

All Employees are obliged to report any suspicion of money laundering, terrorism financing or the financing of the proliferation of weapons of mass destruction through the means established thereto by the Bank.

II. REGULATORY FRAMEWORK

The Superintendency of Banks of Panama regulates and supervises Bladex, its Subsidiaries and its Offices located abroad, as well as its Agencies. Apart from the Superintendency of Banks in Panama, the Representation Offices are also subject to the regulations and supervision of the respective Regulators in their host countries, while the New York Agency is regulated and supervised by the New York State Department of Financial Services and the Federal Reserve Board.

A. Laws of Panama

Bladex operates in the Republic of Panama under a General License issued by the National Banking Commission, which entity was replaced by the Superintendency of Banks of Panama, who are the current Regulators and Supervisors of the Bank. Under this General License, Bladex is authorized to carry our banking activities inside as well as outside the Republic of Panama.

On February 26, 1998, Law-Decree N° 9 was enacted in Panama, modified by Executive Decree N° 52, dated 2008, representing the Only Text for the Banking Law in Panama. Furthermore, on April 27, 2015, Law 23 was approved, which sets forth measures for preventing money laundering, the financing of terrorism and the financing of weapons of mass destruction. In addition to that, all rules, bulletins and resolutions issued by the Superintendency of Banks of Panama in order to ensure and regulate compliance with all of the laws that apply to the Panamanian Financial System have to be obligatorily complied with.

All of the regulations enacted by the Superintendency of Banks of Panama are published on their Web Site: www.superbancos.gob.pa

B. Laws of Mexico

The Bladex Representation Office in Mexico is governed by the Credit Institutions Law, which regulates the establishment and operations of representative offices of foreign financial institutions in Mexico.

Furthermore, this Office is subject to the regulations and dispositions that apply to establishing and operating representation offices of foreign financial institutions issued by the Secretary of the Treasury and Public Credit (SHCP by its Spanish initials), as well as the dispositions enacted by the SHCP and the Bank of Mexico regarding financial policies. It is also subject to inspection and supervision by the National Banking and Securities Commission.

The subsidiary, BLX Solutions, S.A. de C.V. is governed by the Credit Institutions Law and is subjected to the regulations and dispositions enacted by the National Banking and Securities Commission (CNBV by its Spanish initials), as well as by the National Commission for the Protection and Defense of Financial Services Users.

C. Laws of Argentina

The Bladex Representation Office in Argentina operates based on the guidelines issued by the Central Bank of the Argentine Republic (BCRA by its Spanish initials), which establishes the regulations that apply to the Representatives of foreign financial entities. The main juridical rules and regulations that apply are the following:

- (i) Law 25.246 against money laundering and the financing of terrorism, and its complementary norms.
- (ii) The Rules and Regulations for the Prevention of Money Laundering and Other Unlawful Activities, dictated by the BCRA.
- (iii) The Rules and Regulations for the Prevention of Terrorism Financing, as dictated by the BCRA.
- (iv) Resolution UIF N° 30-E/2017 regarding the measures and procedures that financial and currency exchange entities in the financial sector must adhere to in order to prevent, detect and report such deeds, acts, omissions or operations as may come from or be related to committing a crime of money laundering or the financing of terrorism.
- (v) Resolution UIF 29/2013 regarding the Prevention of the Financing of Terrorism.

D. Laws of Brazil

Bladex Representação Ltda. is the Subsidiary, established according to the laws of Brazil and that acts as the Bank's Representation Office in Brazil. Bladex Representação Ltda. is subject to the supervision of the Central Bank of Brazil, which regulates and supervises the activities of foreign financial institutions' representation offices in Brazil.

E. Laws of Colombia

The Representation Office in Colombia operates under the supervision of the Colombian Financial Superintendence. This regulatory entity issues dispositions that apply to the Bladex Representation Office,

F. Laws of Peru

The operations of the Representation Office in Peru are governed by the guidelines issued by the Peruvian Superintendence of Banks and Insurance, which is the entity in charge of overseeing the country's financial market.

G. Laws of the United States of America (New York Agency)

- **Laws of the State of New York**: The Bladex New York Agency operates under a license granted by the New York State Banking Supervision Office. It falls under the supervision of the New York State Banking Department (NYSBD), and must also adhere to the laws regulating operations of foreign banks in the State of New York.
- **Federal Laws**: In addition to the laws of the State of New York, the New York Agency is subject to federal regulations, mainly the International Banking Act of 1978 (IBA), the regulations whereof establish the general guidelines for offices of foreign banks operating in the United States.

As established in the "Supplementary Law for Foreign Banking Supervision", the New York Agency must comply with the reporting and review requirements imposed by the "Federal Reserve System's Board of Governors", who are empowered to supervise the starting up, operations and eventual termination of foreign banks' activities in the United States.

III. ORGANIZATIONAL STRUCTURE

The Bladex Board of Directors have approved a compliance structure with the necessary resources as well as the authority and independence required for developing, implementing and supervising a compliance program that enables it to ensure that the Bank, its Subsidiaries, Representation Offices and Agencies comply with the laws and policies that apply in the different countries where Bladex is operating.

The Compliance Area is administratively located in the Legal and Compliance Area, reporting functionally to the Bank's Prevention and Compliance Committee and to the Board of Directors.

The New York Agency has a Compliance Officer who is exclusively dedicated to his activities with sufficient authority and independence to implement and administrate the compliance program, pursuant to such regulations as may be applied by the US Regulators, mainly the "Bank Secrecy Act" the "Anti Money Laundering and Countering Financing of Terrorism Act" as well as the sanctions administered by "OFAC"

A. Prevention and Compliance Committee

The Prevention and Compliance Committee will have the responsibilities described in its Charter, to wit: Approving the Compliance Program and coordinating the "Anti-Money Laundering" activities; Monitoring the work done and operations analyzed by the Compliance Area, such as the implementation, execution and control of its compliance program; Preliminary Approval of the Anti-Money Laundering Manual, the Know your Customer and/or Final Beneficiary Manual, as well as its internal rules and regulations (Charter), which will be ratified and approved by the Board of Directors, at least once every year.

They will also be responsible for the Approval of the Certification that should be issued if there are no revisions made to the Anti-Money Laundering Manual and/or the Know your Customer and/or Final Beneficiary Manual, which should be signed by the Prevention and Compliance Committee Chairman. The approval of this Certification must be set forth in the minutes of the respective Committee meeting, as well as for: Approval of the Certification that should be issued if there are no revisions made to the method for classifying the Customers' risk, which should be signed by the Prevention and Compliance Committee Chairman. The approval of this Certification must be set forth in the minutes of the respective Committee meeting and they should also be informed of the statistics regarding the training related to "Anti-Money Laundering" issues and make decisions in cases of Customers related to "Anti-Money Laundering" issues as well as such as may be disposed by applicable Law, Rules or Regulations.

B. The Executive Committee

The Executive Committee is a standing committee at Bladex, with the main objective of directing and undertaking the Bank's Administrative Management, based on the delegation of powers from the Board of Directors. The Executive Committee will review compliance issues in order to ensure that the decisions made, and resolutions adopted by the Board of Directors and its Committees be implemented correctly.

C. Ethics Committee

The Bank's Ethics Committee is the Management body that is responsible for interpreting, implementing, applying and constantly evaluating the dispositions in the Organization's Code of Ethics. It is also responsible for implementing the necessary mechanisms needed for disseminating and promoting the highest standards of conduct at the Bank, as well as for hearing and resolving all issues related to violations of the Code of Ethics and its principles.

IV. “KNOW YOUR CUSTOMER” POLICY (CONTRACTUAL OR BUSINESS RELATIONSHIPS)

The “Know your Customer” policy covers each and every kind of contractual or business relationship between the Bank and its Customers. For this reason, it is important to reasonably identify the Customers and know their business, markets in which they are operating, shareholders, main executives and all such persons as may have any control influence, among other aspects.

To meet each and every requirement established by the Bank regarding the “Know your Customer” policy, is a responsibility of each and every executive authorized by Bladex to sign up a customer, through a commercial, correspondent or treasury business relationship.

Therefore, stating or alleging that they were unaware of the legal dispositions, internal manuals and policies of the Bank (intentional blindness), assuming that those were issues that did not affect Bladex, shall not exonerate any Employee of his or her responsibility in the event of any non-compliance with the “Anti-Money Laundering” policies and procedures established by the Bank. All Employees must consult the Compliance Area if they have any doubt at all.

The “Know your Customer” Policy has the following objectives, to:

1. Reasonably know a Customer’s identity and activities.
2. Establish criteria that will make it possible to timely detect activities that raise suspicions of money laundering, terrorism financing or the financing of the proliferation of weapons of mass destruction.
3. Protect the reputation of Bladex and reduce the risk that its services are being used for legitimizing funds coming from unlawful activities, which could cause, among other things, negative consequences, a confiscation of a Customer’s money and the imposition of criminal, administrative and/or pecuniary sanctions on the Bank itself, its Directors and/or Employees.
4. Establish the guidelines in order to be certain that the institutional clients and corporate customers with whom we have a contractual or business relationship do have a physical presence (real business activity) and that they are duly established and regulated in the country where they operate.

A. Customer Risk

The Compliance Area, together with the other departments at the Bank, must identify the risk of money laundering, the financing of terrorism and the financing of the proliferation of weapons of

mass destruction for the Bank, its Representation Offices and Subsidiaries, based on the specific profiles of each Customer and the credit limit provided by the Bank. Thereto, Bladex applies additional controls for Customers that operate:

1. As Off-Shore banks and companies.
2. In regions considered as having a high degree of operating drug-trafficking cartels and related crimes.
3. Whenever there are payments to third parties.

Added to the above, we have additional controls for:

4. Customers that appear on the lists of Specially Designated Nationals (SDN), the Office of Foreign Assets Control (OFAC) and the US Treasury Department.
5. Clients who have been identified and/or penalized by some authority due to weaknesses in their “Ant-Money Laundering” controls.
6. Clients who have been identified and/or penalized for crimes related to money laundering, the financing of terrorism and the financing of the proliferation of weapons of mass destruction.

A-1 Review Focus

When dealing with Customers that are classified as High-Risk, then a more enhanced due diligence should be done, including the following aspects:

1. Obtain approval from Senior Management for establishing business relationships with such Customers, when applicable, or update the profile for existing Customers.
2. Carry out an ongoing and intensified monitoring of their operations during the whole contractual relationship.

Without prejudice to such Customers who, according to the Bank’s risk assessment, are considered to be High-Risk Customers, the following are included in that category:

1. Politically Exposed Persons (PEP).
2. Customers with equity or partners coming from countries or territories that are being considered as “non-cooperating” by the Financial Action Task Force (FATF).
3. Any such other Customers as may be classified to be High-Risk by the Bank.

The Bank does not manage accounts for individuals (we are not in the retail banking business), as it is a Supranational Bank, specializing in financing foreign trade in Latin America and the Caribbean. However, the Bank does check for the existence of a PEP on the Boards of Directors, Management Teams and direct owners (Shareholders) of Bladex’s Customers.

A-2 Shell Banks

These are banks established in a country or jurisdiction without having any physical presence there and that are not subsidiaries of any regulated financial group. The characteristics of a Shell Bank are:

1. It does not engage in any business or activities in a physical location in the country where it is incorporated.
2. It does not employ any full time staff for executing any activity.
3. It does not have operating records at its domicile location.
4. It is not subject to regulation or supervision by the banking authority that issued its operating license.

It is Bladex policy to not allow starting or maintaining any relationships with Shell Banks.

A-3 Shell Corporations

These are companies established in a country or jurisdiction without having any physical presence there and that are not subsidiaries of any regulated financial groups.

It is Bladex policy to not allow starting or maintaining any relationships with Shell Corporations, unless they are guaranteed by or part of a legally established operating company.

B. Due Diligence over Customers

When we become more and more familiar with and adequately understand the activities of the Bank's Customers, we will detect and consequently investigate irregular or unusual behavior in their activities or sudden changes therein. The primordial purpose of applying the Due Diligence (DD) concept is to detect signs that, even if they do not mean that there is evidence of some unusual behavior, do not pass unnoticed and that they are duly investigated.

B-1 Identification of the Final Beneficiary

Whenever the final beneficiary is a juridical person, then the Due Diligence is extended until we know the natural person who is the owner or controller behind the juridical person.

In order to identify the final beneficiary for joint stock corporations, the pertinent diligences should be done for identifying the shareholders holding ten percent (10%) or more of the shares issued by our Customer.

For other juridical persons, whose final beneficiaries cannot be identified through the shareholding registers, a certification or affidavit should be requested indicating the final beneficiaries.

C. Enhanced Due diligence for High-Risk Customers

When a Customer is considered as a high-risk one, then we are obligated to review each and every one of their transactions carried out through the Bank with more attention. Therefore, all transactions carried out with a High-Risk Customer will include an approval from Senior Management and the Compliance Area.

D. Risk Assessment

It is Bladex Policy that, prior to onboarding each Customer and periodically for updating the profiles, a validation should be undertaken of the documents provided vis-à-vis the onboarding requirements matrix. The risk classification given to the Customer, whether low, medium or high, should also be considered.

E. Risk Mitigation

Bladex applies a Due Diligence both at the moment of establishing a Credit Facility for a Customer, as well as for each of the transactions being carried out, through its monitoring process.

The transactions that a Customer may carry out with Bladex are those that have been previously authorized by the Risk Management Area, after a quantitative and qualitative analysis of the Customer. Hence, the transactional profile of the Customer and the level of credit acceptance will depend on the credit risk analysis.

In addition to a Customer's credit analysis, the following aspects have been recognized as mitigating points in compliance with established "Anti-Money Laundering" regulations:

1. No business relationship is established (active, passive or contingent) until the Due Diligence process has been completed. To do so, the Bank will maintain different levels of responsibility in the process of onboarding and updating Customers.
2. There are different levels of operational responsibility for the active, passive and contingent operations being carried out.
3. The Compliance Area will evaluate the results of each Due Diligence and Enhanced Due Diligence.
4. For the Due Diligence process for financial institutions, Bladex will request the Patriot Act Certification and the AML/CFT Questionnaire.
5. The "Anti-Money Laundering" Questionnaires related to the Know your Customer Policy are in order to check if the internal policies and procedures of the banks that are Bladex Clients are in line with international standards.
6. No relationship will be established with or transactions processed for participants and countries that are mentioned on the US OFAC lists or restrictive lists of a similar nature.

All Executives in the Business Area, together with the Enterprise Risk Management Area, have and monitor information regarding each and every one of the Bank's Customers. Therefore, every time an Executive calls on one of his or her Customers, he or she is obliged to prepare a Call Report and keep a copy in the Customer's file, whether this is a Credit Customer or Treasury Client, for their due control and monitoring. This documentation will be the basis and the control for complying with the annual updating of files required by the regulators.

Customer files will be updated according to their risk level:

- High Risk: at least every 12 months
- Medium Risk: at least every 24 months
- Low Risk: at least every 36 months.

Should there be any substantial changes in a Customer's profile, then it shall become necessary to carry out the Customer *KYC Update* Process.

V. ANTI-MONEY LAUNDERING

Examining any kind of transactions, regardless of its amount, that could be linked to the crime of money laundering, the financing of terrorism or the financing of the proliferation of weapons of mass destruction very carefully is an obligation established by regulations that apply to the Bank.

In order to comply with this regulatory requirement, the Bank establishes preventive measures in all of its activities, with special attention to its main activity, which is extending credit to banks, corporations and companies in the Caribbean and Latin American Region.

Because of their nature, activities for financing foreign trade are susceptible to fraud, money laundering, the financing of terrorism or the financing of the proliferation of weapons of mass destruction and even to an indirect participation of people or countries on the OFAC list, or other international restrictions for the prevention of money laundering, the financing of terrorism and the financing of the proliferation of weapons of mass destruction.

Because of the above, Bladex has identified the money laundering, the financing of terrorism or the financing and the proliferation of weapons of mass destruction risk factors that could arise in that kind of financing and hence we have established the controls for mitigating those risks, such as verifying the underlying operations of the transactions that may imply a risk for the Bank.

A. Mitigating Risk

Bladex boosts its controls, regulations and procedures on an ongoing basis, in order to prevent or detect any intent for engaging in Money Laundering operations, through the use of the credit facilities extended by the Bank.

There to, the following “Anti-Money Laundering” risk factors are taken into account:

1. Tax Havens and Underlying Operations in Countries with Tax Havens:

In the event that the underlying transaction is carried out with countries that are considered to be tax havens by the OECD, pertinent information will be obtained that will enable us to identify the real beneficiaries of the transaction.

2. Countries Listed by the FATF:

An Enhanced Due Diligence is done over the transactions that are directly or indirectly related to countries listed by the FATF. In those cases, approval from the Compliance Area must be obtained. However, the countries included on the Red List may neither be linked to nor be part of any operation, directly or indirectly.

3. OFAC List:

No transaction shall be processed that involves an individual or company listed on the Specially Designated Nationals (SDN) list issued by the US Treasury Department’s Office of Foreign Assets Control (OFAC).

4. Bladex shall not undertake any kind of transactions with countries, financial institutions or international transactions that have been considered as high risk in matters of money laundering, the financing of terrorism or the financing of the proliferation of weapons of mass destruction by the Secretary of the Treasury of the United States of America.
5. Commercial details, where the merchandise or product does not have any relation with the importer’s and exporter’s business activities.
6. Activities or products considered high risk, including those subject to international export restrictions (military equipment, arms, munitions, nuclear material, chemical products, etc.).
7. A clear over- or under-billing in the prices of the merchandise and/or services.
8. A clear misrepresentation of the quantities or types of merchandise being imported or exported.
9. An apparent unnecessary business structure, the reason whereof would be to hide the true nature of the business.
10. Payment to third parties that do not partake in the transaction being financed.
11. Shipping or unloading ports and merchandise that have no relation with the Letter of Credit or with the parties to the underlying transaction.

B. Evaluation Criteria

The “Anti-Money Laundering” policies and procedures do have to be complied with obligatorily by all of the Bank’s employees. Therefore, the Compliance Area will resolve such cases as may require an interpretation of the policy’s application in order to meet the requirements inherent thereto, according to the support documentation that will make such determination possible so that there will be no risk implied for the Bank.

VI. MONITORING THE TRANSACTIONS

The “Anti-Money Laundering” monitoring process over transactions is ongoing and systematic. Through this monitoring process, the Compliance Area checks the efficiency and effectiveness of the due diligences applied by the different people responsible for them.

Monitoring transactions will make it possible for the Bank to evaluate if it complies with the requirements, processes and procedures established herein and in the Compliance Manual. It is also an important factor for being certain about the integrity of the Bank’s global controls, as well as of its processes for managing the money laundering, the financing of terrorism and the financing of the proliferation of weapons of mass destruction risks.

Monitoring the transactions is done after their disbursement, pursuant to the stipulations set forth in the Compliance Area Review Plan and the Compliance Risk Profile of each Customer, Product, Service or geographical location.

VII. INDEPENDENT TESTS OF COMPLIANCE MATTERS

The audits done by Bladex’s Internal Auditing Department, as well as those by the Independent Auditors, include a review of established policies and procedures for preventing that the services provided by the Bank are being used for money laundering, the financing of terrorism or the financing of the proliferation of weapons of mass destruction. The Internal Auditing Department will act as an independent watchdog over the Compliance Program.

The Bank’s Internal Auditing Department shall carry out independent tests of the Compliance Program, or they shall be done by qualified independent third parties. Each review will include tests for verifying specific compliance with the Program and for evaluating the pertinent information systems.

The audits must be based on the Bank’s risks and evaluate the quality of managing all operations, areas, offices and subsidiaries of the Bank.

Any non-compliance situation reported as the result of the auditing tests will be communicated to the Bank’s Audit Committee.

VIII. KNOW YOUR EMPLOYEE AND TRAINING PROGRAMS

Training meets the objective of preserving and improving the moral and academic quality of the Employees.

Bladex does consider the human factor as a primordial element for all prevention policies. A good Know your Employee policy leads to preventing, detecting and repressing corrupt practices that tend to facilitate or promote the use of the Bank as a tool for money laundering or financing terrorism.

Bladex has adopted and implemented “Anti-Money Laundering” policies, together with a training program for all staff. This way, everyone at Bladex is kept informed and up to date about the issue.

IX. SUSPICIOUS OPERATIONS

The Bank has procedures in place for preventing and monitoring transactions that enables us to detect any unusual or suspicious activity. We also have an anonymous suspicious transaction reporting system that makes it easy for Employees and Customers to report situations, without disclosing the source of the denunciation, with the aim of detecting, investigating and following up on potentially suspicious activities.

Every activity that is considered to be unusual or outside the approved profile of a Customer, shall be subjected to a due investigation in order to determine the viability of filing a Suspicious Activity Report (SAR) with the competent authorities or not.

Any Employee who has reported an unusual or suspicious operation, or becomes aware of an undesirable customer because it is linked to unlawful and/or money laundering activities, is obliged to keep this confidential and may not, under any circumstances, disclose any type of information related to the subject reported or of which they have become aware to the Customer or any other person related to the suspicious activity.

The Bank’s Compliance Area does have the necessary authority and independence for filing a Suspicious Activity Report with the corresponding authorities, when the information they have so warrants it, pursuant to such procedure as may be determined thereto. The Prevention and Compliance Committee and the Bank’s Board of Directors must be informed that a Suspicious Activity Report has been filed

X. CONCLUSIONS OF THE PREVENTION AND COMPLIANCE COMMITTEE

It is understood that the Bladex Board and Management do not delegate the responsibility for due conduct of all operations carried out by the Bank in the Compliance Area. This responsibility falls on each and every Employee of the Bank.

The primary responsibility of the Compliance Area is to maintain an effective compliance program that includes promoting a Compliance and “Anti-Money Laundering” Culture at Bladex, and to ensure that all Employees have the necessary information, training and resources needed for complying with the applicable policies, procedures, rules and regulations.

Therefore, the Bank’s Management, through each and every one of the Department Heads or Supervisors, must:

1. Keep an updated copy of the “Know your Customer” and “Anti-Money Laundering” policies and procedures at hand for each of the Bank’s Employees or have it available on the Bank’s Intranet.
2. Ensure that, at least once every year, all staff undergo training about “Anti-Money Laundering” issues. If necessary, they will request the Compliance Area for specific training on such issues as may need to be bolstered.
3. Instruct all Employees reporting to them about the obligation to comply with the procedures deriving from the “Anti-Money Laundering” Policy.
4. Collaborate with the Authorities in combating the crimes of Money Laundering, the Financing of Terrorism and the Financing of the Proliferation of Weapons of Mass Destruction.