

**Anti-Money Laundering Questionnaire**

Financial Institution Name: Banco de Crédito de Crédito de Bolivia S.A.

Location: La Paz - Bolivia (Colón Esq. Mercado N° 1308)

**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?	X	
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?	X	
3.	Does the FI have a written policy in place to meet the requirements imposed by the AML Regulations, namely the FATF/GAFI recommendations on Money laundering and terrorist financing?	X	
4.	Who does the Compliance Officer report to?		
The Compliance Officer reports functionally to the Corporate Compliance Officer.			
5.	Has the FI developed written policies documenting the processes that they have in place to prevent, detect and report suspicious transactions?	X	
6.	Is the FI subject to external auditing and control by a supervisory body with regards to combating money laundering in domestic units/units abroad?	X	
7.	How often does the regulatory body conduct an audit on the FI?		
The internal audit is realized two times a year, raising report to the regulatory orga006E.			
8.	What is the frequency of the external audit?		
The external audit performed with an annual frequency.			
9.	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 a regular basis?	X	
10.	Does the FI have policies to ensure that it will not conduct transactions with or provide downstream products and services to other FI's that do not comply with industry best practices?	X	
		Yes	No
11.	Does the FI have a policy prohibiting third parties to have direct access to FI's correspondent accounts?	X	
12.	Does the FI's AML/CTF/KYC have policies and procedures prohibiting opening or maintaining anonymous accounts?	X	

13.	Does the FI have a policy prohibiting accounts / relationships with shell banks?	X	
14.	Does the FI have policies to reasonably ensure that they will not conduct transactions with or on behalf of shell banks through any of its accounts or products?	X	
15.	Does the FI have policies covering relationships with PEPs, their family and close associates?	X	
16.	Does the FI have record retention procedures that comply with applicable law?	X	
17.	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?	X	
18.	Does the FI have policies prohibiting other financial institutions to conduct transactions through its correspondent accounts (nested accounts)?	X	

## II. Risk Assessment

		Yes	No
19.	Does the FI have a risk-based assessment of its customer base and their transactions?	X	
20.	Does the FI determine the appropriate level of enhanced due diligence necessary for those categories of customers and transactions that the FI has reason to believe pose a heightened risk of illicit activities at or through the FI?	X	

## III. Know your Customer, Due Diligence and Enhanced Due Diligence

		Yes	No
21.	Has the FI implemented processes for the identification of those customers on whose behalf it maintains or operates accounts or conducts transactions?	X	
22.	Does the FI have a requirement to collect information regarding its customers' business activities?	X	
		Yes	No
23.	Does the FI assess its customers' AML policies or practices?	X	
24.	Does the FI have a process to review and, where appropriate, update customer information relating to high risk client information?	X	
25.	Does the FI have procedures to establish a record for each new customer noting their respective identification documents and 'Know your customer' information?	X	
26.	Does the FI complete a risk-based assessment to understand the normal and expected transactions of its customers?	X	

IV. Reportable Transactions and Prevention and Detection of Transactions with Illegally Obtained Funds

		Yes	No
27.	Does the FI have policies or practices for the identification and reporting of transactions that are required to be reported to the authorities?	X	
28.	Where cash transaction reporting is mandatory, does the FI have procedures to identify transactions structured to avoid such obligations?	X	
29.	Does the FI screen customers and transactions against lists of persons, entities or countries issued by government / competent authorities?	X	
30.	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?	X	
31.	Does your AML program include monitoring client activities /transactions and applying due diligence in order to detect suspicious transactions?	X	
32.	Does the FI report suspicious activity to the relevant authorities? Provide the name of the authorities.	X	
Unidad de Investigación Financiera de Bolivia, dependent on the ASFI (Autoridad de Supervisión del sistema Financiero)			

V. Transaction Monitoring

		Yes	No
33.	Does the FI have a monitoring program for unusual and potentially suspicious activity that covers funds transfers and monetary instruments such as traveler checks, money orders, etc?	X	
34.	Does the regulation of your institution require establishing procedures to monitor large cash deposits and withdrawals?	X	

VI. AML Training

		Yes	No
35.	Does the FI provide AML training to relevant employees that includes: <ul style="list-style-type: none"> <li>• Identification and reporting of transactions that must be reported to government authorities.</li> <li>• Examples of different forms of money laundering involving the FI's products and services.</li> <li>• Internal policies to prevent money laundering.</li> </ul>	X	
36.	What is the frequency of the training?		
Twice a year for employees that have direct contact with customers (front office) and once a year for the staff (back office).			
37.	Does the FI retain records of its training sessions including attendance records and relevant training materials used?	X	
38.	Does the FI communicate new AML related laws or changes to existing AML related policies or practices to relevant employees?	X	

39.	Does the FI employ third parties to carry out some of functions of the FI?		X
40.	If the answer to question 38 is yes, does the FI provide AML training to relevant third parties that includes: <ul style="list-style-type: none"> <li>• Identification and reporting of transactions that must be reported to government authorities.</li> <li>• Examples of different forms of money laundering involving the FI's products and services.</li> <li>• Internal policies to prevent money laundering.</li> </ul>	N/A	
41.	Does the FI have a Code of Conduct and representations by their employees of their understanding and agreement to abide by the Code of Conduct including AML provisions?	X	

VII. Country Regulatory information

		Yes	No
42.	Has your country established laws designed to prevent money laundering and terrorist financing and is your institution subject to such laws?	X	
43.	If YES, please list the names of your country's relevant laws below	X	
<ul style="list-style-type: none"> <li>• Ley No. 1768 de Modificaciones al Código penal de 10 de marzo de 1997 introduce el régimen penal y administrativo de la legitimación de ganancias ilícitas</li> <li>• El artículo 185 de la citada ley establece la creación de la Unidad de Investigaciones Financieras de Bolivia</li> <li>• D.S. N°24771 reglamenta las funciones, atribuciones y obligaciones de la Unidad de Investigaciones Financieras</li> <li>• Resolución administrativa UIF/016/99 del 12 de julio de 1999</li> </ul> <p>According to Resolution SBS (Perú) 11695-2008 November 27, 2008, For being the Banco de Crédito de Bolivia S.A. is subsidiary of the Banco de Crédito del Perú, must be complied to prevention measures of money laundering, and the financing of terrorism compatible with the required in Perú:</p> <ul style="list-style-type: none"> <li>• Ley N° 27693 publicada el 21 de Marzo de 2002, que creó la Unidad de Inteligencia Financiera del Perú, y modificada por la Ley N° 28306.</li> <li>• D.S. N° 018-2006-JUS publicado el 21 de Julio de 2006.</li> <li>• Resolución SBS N° 838-2008 publicada el 28 de Marzo de 2008, modificada por Resolución SBS N° 11695-2008 publicada el 28 de Noviembre de 2008.</li> </ul> <p>Para mayor información, visitar: <a href="http://www.sbs.gob.pe/UIF/Leyes.asp?tipo=1">http://www.sbs.gob.pe/UIF/Leyes.asp?tipo=1</a></p>			

<b>44.</b>	Has your institution had any regulatory or criminal enforcement actions resulting from violations of AML laws or regulations in the past five years?		<b>X</b>
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VIII. Additional information

<b>45.</b>	Tax Id. or Equivalent																
	NIT N° 1020435022 (Taxpayer Identification Number)																
<b>46.</b>	Swift Address																
	BCPLBOLX																
<b>47.</b>	Bank's web site																
	<a href="http://www.bancodecredito.com">www.bancodecredito.com</a>																
<b>48.</b>	Registration / License																
	License: Resolución ASFI/DAJ N° 006/2009, granted by Autoridad de Supervisión del Sistema Financiero																
<b>49.</b>	Please list the principle countries in which your bank maintains branches, agencies and subsidiaries.																
	None.																
<b>50.</b>	Is your institution publicly traded? If yes, on which exchange?																
	No.																
<b>51.</b>	Please provide the names of any shareholder holding more than 20 pct of shares in your institution.																
	Banco de Crédito del Perú 86.47 %																
<b>52.</b>	Please list the board of directors of your financial institution																
	<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 50%;">Nombre</th> <th style="width: 50%;">Cargo</th> </tr> </thead> <tbody> <tr> <td>Dionisio Romero Paoletti</td> <td>Presidente</td> </tr> <tr> <td>Raimundo Morales Dasso</td> <td>Vicepresidente</td> </tr> <tr> <td>Reynaldo Llosa Barber</td> <td>Director</td> </tr> <tr> <td>Fernando Fort Marie</td> <td>Director</td> </tr> <tr> <td>Juan Carlos Verme Giannoni</td> <td>Director</td> </tr> <tr> <td>Benedicto Cigüeñas Guevara</td> <td>Director</td> </tr> <tr> <td>Walter Bayly Llona</td> <td>Director</td> </tr> </tbody> </table>	Nombre	Cargo	Dionisio Romero Paoletti	Presidente	Raimundo Morales Dasso	Vicepresidente	Reynaldo Llosa Barber	Director	Fernando Fort Marie	Director	Juan Carlos Verme Giannoni	Director	Benedicto Cigüeñas Guevara	Director	Walter Bayly Llona	Director
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