

Financial Institution Name: Banco de la República

Location: Cra 7 No 14-78 Bogotá/ Colombia

Anti-Money Laundering Questionnaire

If you answer "no" to any question, additional information can be supplied at the end of the questionnaire.

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?	YES		
2. Does the Banco de la República have a legal and regulatory compliance program that includes a designated officer that is responsible for coordinating and overseeing the AML framework?	YES		
3. Has the Banco de la República developed written policies documenting the processes that they have in place to prevent, detect and report suspicious transactions?	YES		
4. In addition to inspections by the government supervisors/regulators, does the Banco de la República's client have an internal audit function or other independent third party that assesses AML policies and practices on a regular basis?	YES		
5. Does the Banco de la República 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.)	YES		
6. Does the Banco de la República 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?	YES		
7. Does the Banco de la República have policies covering relationships with Politically Exposed Persons (PEP's), their family and close associates?	YES		
8. Does the Banco de la República have record retention procedures that comply with applicable law?	YES		
9. Are the Banco de la República'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?	YES		
II. Risk Assessment		Yes	No
10. Does the Banco de la República have a risk-based assessment of its customer base and their transactions?	YES		
11. Does the Banco de la República determine the appropriate level of enhanced due diligence necessary for those categories of customers and transactions that the Banco de la República has reason to believe pose a heightened risk of illicit activities at or through the FI?	YES		
III. Know Your Customer, Due Diligence and Enhanced Due Diligence		Yes	No
12. Has the Banco de la República implemented processes for the identification of those customers on whose behalf it maintains or operates accounts or conducts transactions?	YES		