the Wolfsberg Group

Financial Institution Name: Location (Country) : BANCO ECONOMICO S.A.
BOLIVIA

The questionnaire is required to be answered on a Legal Entity (LE) Level. The Financial Institution should answer the questionnaire at the legal entity level including any branches for which the client base, products and control model are materially similar to the LE Head Office. This questionnaire should not cover more than one LE. Each question in the CBDDQ will need to be addressed from the perspective of the LE and on behalf of all of its branches. If a response for the LE differs for one of its branches, this needs to be highlighted and details regarding this difference captured at the end of each sub-section. If a branch's business activity (products offered, client base etc.) is materially different than its Entity Head Office, a separate questionnaire can be completed for that branch.

No#	Question	Answer
	Y & OWNERSHIP	
1	Full Legal Name	
		BANCO ECONOMICO S.A.
		BANGO EGONOMIGO 3.A.
2	Append a list of foreign branches which are covered by	
	this questionnaire	Banco Economico S.A. has no have foreign branches
		Barico Economico S.A. nas no nave loreign branches
3	Full Legal (Registered) Address	
		AVACUCHO STREET Nº 166 SANTA CRUZ DE LA SIEDRA
		AYACUCHO STREET № 166, SANTA CRUZ DE LA SIERRA
4	Full Primary Business Address (if different from above)	
5	Date of Entity incorporation/establishment	
		19/12/1990
	Colored to the colore	
6	Select type of ownership and append an ownership chart	
C =	if available	V.
6 a 1	Publicly Traded (25% of shares publicly traded) If Y, indicate the exchange traded on and ticker	No
vai	symbol	
	Symbol .	
6 b	Member Owned/Mutual	No
6 c	Government or State Owned by 25% or more	No
6 d	Privately Owned	Yes
6 d1	If Y, provide details of shareholders or ultimate	
	beneficial owners with a holding of 10% or more	EMPRESA DE ENVASES PAPELES Y CARTONES S.A. (36,45%)
		IVO MATEO KULJIS FUCHTNER (10.91%)
		ELVIO LUIS PERROGON TOLEDO (10.92%)
7	% of the Entity's total shares composed of bearer shares	
		N/A
8	Does the Entity, or any of its branches, operate under an	
	Offshore Banking License (OBL)?	No
8 a	If Y, provide the name of the relevant branch/es which	
	operate under an OBL	
9	Does the Bank have a Virtual Bank License or provide	no
10	services only through online channels?	
IU	Name of primary financial regulator/supervisory authority	
		AUTORIDAD DE SUPERVISIÓN DEL SISTEMA FINANCIERO - ASFI
44	Denvide Level Fath Ideal/F 10 FD 7	
11	Provide Legal Entity Identifier (LEI) if available	
	1	984500E6N10CBF80LE25
	Devide the Citizens of the city	
12	Provide the full legal name of the ultimate parent (if	
	different from the Entity completing the DDQ)	N/A
13	Jurisdiction of licensing authority and regulator of ultimate	
	parent	ESTADO PLURINACIONAL DE BOLIVIA
		The state of the s
14	Select the business areas applicable to the Entity	
14 a 14 b	Retail Banking Private Banking	Yes No

	O	
14 c	Commercial Banking	Yes
14 d	Transactional Banking	Yes
14 e	Investment Banking	No
14 f	Financial Markets Trading	No
14 g	Securities Services/Custody	No
14 h	Broker/Dealer	No
14 i	Multilateral Development Bank	No
14 j	Wealth Management	No
14 k	Other (please explain)	-
15	Does the Entity have a significant (10% or more) portfolio of non-resident customers or does it derive more than 10% of its revenue from non-resident customers? (Non-resident means customers primarily resident in a different jurisdiction to the location where bank services are provided)	No
15 a	If Y, provide the top five countries where the non- resident customers are located.	-
16	Select the closest value:	
16 a	Number of employees	1001-5000
16 b	Total Assets	Greater than \$500 million
17	Confirm that all responses provided in the above Section are representative of all the LE's branches.	Yes
17 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	•
18	If appropriate, provide any additional information/context	
10	to the answers in this section.	
	to the answers in this section.	
2. PRODI	to the answers in this section. UCTS & SERVICES	
	to the answers in this section.	
2. PRODI	to the answers in this section. UCTS & SERVICES Does the Entity offer the following products and services:	No.
2. PRODI 19	to the answers in this section. UCTS & SERVICES Does the Entity offer the following products and services: Correspondent Banking	No
2. PRODI	to the answers in this section. UCTS & SERVICES Does the Entity offer the following products and services: Correspondent Banking If Y Does the Entity offer Correspondent Banking	No No
2. PRODI 19 19 a 19 a1	to the answers in this section. UCTS & SERVICES Does the Entity offer the following products and services: Correspondent Banking If Y Does the Entity offer Correspondent Banking services to domestic banks? Does the Entity allow domestic bank clients to	
2. PRODI 19 19 a 19 a 19 a1 19 a1a	to the answers in this section. UCTS & SERVICES Does the Entity offer the following products and services: Correspondent Banking If Y Does the Entity offer Correspondent Banking services to domestic banks? Does the Entity allow domestic bank clients to provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with	No No
2. PRODI 19 19 a 19 a1 19 a1a 19 a1b	to the answers in this section. UCTS & SERVICES Does the Entity offer the following products and services: Correspondent Banking If Y Does the Entity offer Correspondent Banking services to domestic banks? Does the Entity allow domestic bank clients to provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking	No No
2. PRODI 19 19 a 19 a1 19 a1a 19 a1b	to the answers in this section. UCTS & SERVICES Does the Entity offer the following products and services: Correspondent Banking If Y Does the Entity offer Correspondent Banking services to domestic banks? Does the Entity allow domestic bank clients to provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking services to foreign banks? Does the Entity allow downstream relationships	No No No
2. PRODI 19 19 a 19 a1 19 a1a 19 a1b 19 a1c	to the answers in this section. UCTS & SERVICES Does the Entity offer the following products and services: Correspondent Banking If Y Does the Entity offer Correspondent Banking services to domestic banks? Does the Entity allow domestic bank clients to provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking services to foreign banks? Does the Entity allow downstream relationships with foreign banks? Does the Entity have processes and procedures in place to identify downstream relationships with	No No No No
2. PRODI 19 19 a 19 a1 19 a1a 19 a1b 19 a1c 19 a1d 19 a1e	to the answers in this section. UCTS & SERVICES Does the Entity offer the following products and services: Correspondent Banking If Y Does the Entity offer Correspondent Banking services to domestic banks? Does the Entity allow domestic bank clients to provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking services to foreign banks? Does the Entity allow downstream relationships with foreign banks? Does the Entity allow downstream relationships with foreign banks?	No
2. PRODI 19 19 a 19 a1 19 a1a 19 a1b 19 a1c 19 a1d 19 a1e 19 a1f 19 a1g	UCTS & SERVICES Does the Entity offer the following products and services: Correspondent Banking If Y Does the Entity offer Correspondent Banking services to domestic banks? Does the Entity allow domestic bank clients to provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking services to foreign banks? Does the Entity allow downstream relationships with foreign banks? Does the Entity allow downstream relationships with foreign banks? Does the Entity fore Correspondent Banking services to identify downstream relationships with foreign banks? Does the Entity offer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTSs)? Does the Entity allow downstream relationships with MSBs, MVTSs, or Payment Service Provider (PSPs)?	No
2. PRODI 19 19 a 19 a1 19 a1a 19 a1b 19 a1c 19 a1d 19 a1d 19 a1f 19 a1f	to the answers in this section. UCTS & SERVICES Does the Entity offer the following products and services: Correspondent Banking If Y Does the Entity offer Correspondent Banking services to domestic banks? Does the Entity allow domestic bank clients to provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking services to foreign banks? Does the Entity allow downstream relationships with foreign banks? Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks? Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks? Does the Entity offer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTSs)? Does the Entity allow downstream relationships with MSBs, MVTSs, or Payment Service Provider (PSPS)? MSBs	No
2. PRODI 19 19 a 19 a1 19 a1a 19 a1b 19 a1c 19 a1d 19 a1e 19 a1f 19 a1g	UCTS & SERVICES Does the Entity offer the following products and services: Correspondent Banking If Y Does the Entity offer Correspondent Banking services to domestic banks? Does the Entity allow domestic bank clients to provide downstream relationships? Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? Does the Entity offer Correspondent Banking services to foreign banks? Does the Entity allow downstream relationships with foreign banks? Does the Entity allow downstream relationships with foreign banks? Does the Entity fore Correspondent Banking services to identify downstream relationships with foreign banks? Does the Entity offer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTSs)? Does the Entity allow downstream relationships with MSBs, MVTSs, or Payment Service Provider (PSPs)?	No

19 a1i	Does the Entity have processes and procedures in	
	place to identify downstream relationships with	No I
	MSBs /MVTSs/PSPs?	
19 b		No Section 1997
19 c	Cross-Border Remittances	Yes
19 d	Domestic Bulk Cash Delivery	No
19 e	Hold Mail	No .
19 f	International Cash Letter	No
	Low Price Securities	
19 g		No
19 h	Payable Through Accounts	No
19 i	Payment services to non-bank entities who may then	
		No
19 i1	If Y, please select all that apply below?	
19 i2	Third Party Payment Service Providers	No
19 i3	Virtual Asset Service Providers (VASPs)	No
19 i4	eCommerce Platforms	
19 i5	Other - Please explain	
19 j	Private Banking	-
		No
19 k	Remote Deposit Capture (RDC)	No
191	Sponsoring Private ATMs	No
19 m	Stored Value Instruments	No No
19 n	Trade Finance	Yes
19 o	Virtual Assets	No
19 p	For each of the following please state whether you offer the service to walk-in customers and if so, the	
	applicable level of due diligence:	
19 p1	Check cashing service	No
19 p1a	If yes, state the applicable level of due diligence	
19 p2	Wire transfers	Yes
19 p2a	If yes, state the applicable level of due diligence	
19 p3	Foreign currency conversion	Yes
19 p3a	If yes, state the applicable level of due diligence	Due Diligence
19 p4	Sale of Monetary Instruments	No
19 p4a	If yes, state the applicable level of due diligence	
19 p5	If you offer other services to walk-in customers	
19 ps	please provide more detail here, including describing the level of due diligence.	-
19 q	Other high-risk products and services identified by the Entity (please specify)	-
20	Confirm that all responses provided in the above Section are representative of all the LE's branches.	Yes
20 a	If N, clarify which questions the difference/s relate to	
	and the branch/es that this applies to.	-
21	If appropriate, provide any additional information/context to the answers in this section.	-
2-16-20		
	TF & SANCTIONS PROGRAMME	
22	Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:	
22 a		Yes
22 b	Adverse Information Screening	
		Yes
22 c	Beneficial Ownership	Yes
22 d	Cash Reporting	Yes
22 d 22 e	Cash Reporting CDD	
22 e	CDD	Yes
22 e 22 f	CDD EDD	Yes Yes
22 e 22 f 22 g	CDD EDD Independent Testing	Yes Yes Yes
22 e 22 f 22 g 22 h	CDD EDD Independent Testing Periodic Review	Yes Yes Yes Yes Yes
22 e 22 f 22 g	CDD EDD Independent Testing	Yes Yes Yes
22 e 22 f 22 g 22 h	CDD EDD Independent Testing Periodic Review	Yes Yes Yes Yes Yes
22 e 22 f 22 g 22 h 22 i 22 j	CDD EDD Independent Testing Periodic Review Policies and Procedures PEP Screening	Yes Yes Yes Yes Yes Yes Yes Yes
22 e 22 f 22 g 22 h 22 i	CDD EDD Independent Testing Periodic Review Policies and Procedures PEP Screening Risk Assessment	Yes Yes Yes Yes Yes

	I Outline Aut in B. III	V.
22 m		Yes
22 n		Yes
22 o	Transaction Monitoring	Yes
23	How many full time employees are in the Entity's AML,	11-100
74	CTF & Sanctions Compliance Department?	
24	Is the Entity's AML, CTF & Sanctions policy approved at least annually by the Board or equivalent Senior	
	Management Committee? If N, describe your practice in	Yes
	Question 29.	
25	Does the Board receive, assess, and challenge regular	
20	reporting on the status of the AML, CTF, & Sanctions	Yes
	programme?	
26	Does the Entity use third parties to carry out any	
	components of its AML, CTF & Sanctions programme?	No
26 a	If Y, provide further details	
20 0	ii 1, provide futitier details	
		_
27	Does the entity have a whistleblower policy?	Yes
28	Confirm that all responses provided in the above Section	Yes
-	are representative of all the LE's branches	
28 a	If N, clarify which questions the difference/s relate to	
	and the branch/es that this applies to.	
29	If appropriate, provide any additional information/context	
	to the answers in this section.	
		-
A ANTED	BRIBERY & CORRUPTION	The state of the s
30	Has the Entity documented policies and procedures	
30	consistent with applicable ABC regulations and	
	requirements to reasonably prevent, detect and report	Yes
	bribery and composition?	
31	Does the Entity have an enterprise wide programme that	
01	sets minimum ABC standards?	Yes
32	Has the Entity appointed a designated officer or officers	
	with sufficient experience/expertise responsible for	Yes
	coordinating the ABC programme?	
33	Does the Entity have adequate staff with appropriate	
	levels of experience/expertise to implement the ABC	Yes
	programme?	
34	Is the Entity's ABC programme applicable to:	Both joint ventures and third parties acting on behalf of the Entity
35	Does the Entity have a global ABC policy that:	
35 a	Prohibits the giving and receiving of bribes? This	
	includes promising, offering, giving, solicitation or	
	receiving of anything of value, directly or indirectly, if	Yes
	improperly intended to influence action or obtain an	
	advantage	
35 b	Includes enhanced requirements regarding interaction	Yes
25	with public officials?	
35 c	Includes a prohibition against the falsification of books	
	and records (this may be within the ABC policy or any	Yes
	other policy applicable to the Legal Entity)?	
36	Does the Entity have controls in place to monitor the	Yes
	effectiveness of their ABC programme?	165
37	Does the Board receive, assess, and challenge regular	Von
	reporting on the status of the ABC programme?	Yes
38	Has the Entity's ABC Enterprise Wide Risk Assessment	
	(EWRA) been completed in the last 12 months?	Yes
38 a	If N, provide the date when the last ABC EWRA was	
	completed.	
		-
20	Does the Entity have an ABC residual risk rating that is	
39	the net result of the controls effectiveness and the	Voc
	inherent risk assessment?	Yes
40	Does the Entity's ABC EWRA cover the inherent risk	
	components detailed below:	
40 a	Potential liability created by intermediaries and other	
	third-party providers as appropriate	Yes
40 b	Corruption risks associated with the countries and	
	industries in which the Entity does business, directly or	Yes
	through intermediaries	
40 c	Transactions, products or services, including those	
	that involve state-owned or state-controlled entities or	Yes
	public officials	
40 d	Corruption risks associated with gifts and hospitality,	
	hiring/internships, charitable donations and political	Yes
	contributions	
	l contributions	

40 e	Changes in business activities that may materially increase the Entity's corruption risk	Yes
41	Does the Entity's internal audit function or other	
	independent third party cover ABC Policies and Procedures?	Yes
42	Does the Entity provide mandatory ABC training to:	
42 a	Board and senior Committee Management	Yes
42 b	1st Line of Defence	Yes
42 c	2nd Line of Defence	Yes
42 d	3rd Line of Defence	Yes
42 e	Third parties to which specific compliance activities	
42 f	subject to ABC risk have been outsourced	Not Applicable
	Non-employed workers as appropriate (contractors/consultants)	Not Applicable
43	Does the Entity provide ABC training that is targeted to specific roles, responsibilities and activities?	Yes
44	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
44 a	If N, clarify which questions the difference/s relate to	
	and the branch/es that this applies to.	-
45	If appropriate, provide any additional information/context	
	to the answers in this section.	
5. AML, C	TF & SANCTIONS POLICIES & PROCEDURES	
46	Has the Entity documented policies and procedures	
	consistent with applicable AML, CTF & Sanctions	
	regulations and requirements to reasonably prevent,	
	detect and report:	
46 a	Money laundering	Yes
46 b	Terrorist financing	Yes
46 c	Sanctions violations	Yes
47	Are the Entity's policies and procedures updated at least annually?	Yes
48	Has the Entity chosen to compare its policies and procedures against:	
48 a	U.S. Standards	Yes
48 a1	If Y, does the Entity retain a record of the results?	Yes
48 b	EU Standards	Yes
48 b1	If Y, does the Entity retain a record of the results?	Yes
49	Does the Entity have policies and procedures that:	
49 a	Prohibit the opening and keeping of anonymous and	
	fictitious named accounts	Yes
49 b	Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs	Yes
49 c	Prohibit dealing with other entities that provide banking services to unlicensed banks	Yes
49 d	Prohibit accounts/relationships with shell banks	Yes
49 e	Prohibit dealing with another entity that provides	
	services to shell banks	Yes
49 f	Prohibit opening and keeping of accounts for Section 311 designated entities	Yes
49 g	Prohibit opening and keeping of accounts for any of	
9	unlicensed/unregulated remittance agents, exchanges	Yes
	houses, casa de cambio, bureaux de change or money transfer agents	
49 h	Assess the risks of relationships with domestic and	
7311	foreign PEPs, including their family and close	Yes
	associates	100

49 i		
	Define the process for escalating financial crime risk issues/potentially suspicious activity identified by emoloyees	Yes
49 j	Define the process, where appropriate, for terminating existing customer relationships due to financial crime risk	Yes
49 k	Define the process for exiting clients for financial crime reasons that applies across the entity, including foreign branches and affiliates	Yes
49 1	Define the process and controls to identify and handle customers that were previously exited for financial crime reasons if they seek to re-establish a relationship	Yes
49 m	Outline the processes regarding screening for sanctions, PEPs and Adverse Media/Negative News	Yes
49 п	Outline the processes for the maintenance of internal "watchlists"	Yes
50	Has the Entity defined a risk tolerance statement or similar document which defines a risk boundary around their business?	Yes
51	Does the Entity have record retention procedures that comply with applicable laws?	Yes
51 a	If Y, what is the retention period?	5 years or more
52	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
52 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	-
53	If appropriate, provide any additional information/context to the answers in this section.	-
0 0144 0		
	TF & SANCTIONS RISK ASSESSMENT	
54	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:	
54 a	Client	Yes
54 b		
	Product	Yes
54 c	Channel	Yes Yes
		Yes
54 c 54 d 55	Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring	Yes Yes
54 c 54 d 55 55 a 55 b	Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence	Yes Yes Yes Yes Yes Yes
54 c 54 d 55 55 a 55 b 55 c	Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification	Yes Yes Yes Yes Yes Yes Yes Yes Yes
54 c 54 d 55 55 a 55 b 55 c 55 d	Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening	Yes
54 c 54 d 55 55 a 55 b 55 c 55 d 55 e	Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News	Yes
54 c 54 d 55 55 a 55 b 55 c 55 c 55 d 55 e	Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education	Yes
54 c 54 d 55 55 a 55 b 55 c 55 c 55 d 55 e	Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance	Yes
54 c 54 d 55 55 a 55 b 55 c 55 c 55 d 55 e	Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education	Yes
54 c 54 d 55 55 a 55 b 55 c 55 d 55 e 55 f 55 g 55 h	Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information	Yes
54 c 54 d 55 55 a 55 b 55 c 55 d 55 e 55 d 55 e 55 f 55 g 56 h	Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed.	Yes
54 c 54 d 55 55 a 55 b 55 c 55 d 55 c 55 d 55 c 55 d 55 p 55 d 55 p 55 d 55 c	Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed.	Yes
54 c 54 d 55 55 a 55 b 55 c 55 d 55 c 55 d 55 e 55 f 55 g 55 h 56 a	Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below:	Yes
54 c 54 d 55 55 a 55 b 55 c 55 d 55 c 55 d 55 c 55 d 55 e 55 d 56 a 57 a	Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client	Yes
54 c 54 d 55 55 a 55 b 55 c 55 d 55 c 55 d 55 e 55 f 55 p 55 h 56 a	Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography	Yes
54 c 54 d 55 55 a 55 a 55 b 55 c 55 d 55 c 55 d 55 f 55 g 55 h 56 56 a 57 57 a 57 b 57 c 57 d 58	Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below:	Yes
54 c 54 d 55 55 a 55 b 55 c 56 d 55 e 55 f 55 g 55 h 56 57 57 a 57 b 57 c 57 d 58	Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent fisk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: Customer Due Diligence	Yes
54 c 54 d 55 55 a 555 b 555 c 556 d 555 c 556 d 556 a 557 c 557 d 57 a 57 d 58 58 a 58 b	Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: Customer Due Diligence Governance	Yes
54 c 54 d 55 55 a 55 b 55 c 56 d 55 e 55 f 55 g 55 h 56 57 57 a 57 b 57 c 57 d 58	Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent fisk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: Customer Due Diligence	Yes

Section Sect			
Section	58 e		
Has the Critin's Sanctions EWRA bean compressed in the set of th	-		
Set 1 2 months? Normotic bit of date when his last Sanctions EVMA was completed.			Yes
was completed. Confirm that all responses provided in the above Section also incredentative of all the LE's boarders. If a provide any additional information/context to the answers in this applies to. If a proprietie, provide any additional information/context to the answers in this accion. If a proprietie, provide any additional information/context to the answers in this accion. If a proprietie, provide any additional information/context to the answers in this accion. If a provide any additional information/context to the answers in this accion. If a provide any additional information/context to the answers in this accion. If a provided any additional information/context to the answers in this accion. If a provided any additional information/context to the context and accident accident and accident accident and accident acc		last 12 months?	Yes
60 Confirm that all reaponses provided in the above Section and noncesstative of all the LE's branches in the Confirmation of	59 a		
are representative of all the LE's pranches 60 a. If N, Carliffy which questions the difference's relate to and he branch'se that this applies to and he branch'se that this applies to and he branch'se that this applies to the services of the provide any additional information/bontax to the animonia in this section. 77. KYC, CDD and EDD 77. KYC, CDD and EDD 78. See See Settily yearly the identity of the customer? 63. Do the Entity's policies and procedures set out when CDD must be completed, or, at the time of bronduring or setting and procedures and procedures are to when CDD must be completed, or, at the time of bronduring or setting and procedures are to when CDD must be completed, or, at the time of bronduring or setting and procedures are to when CDD must be completed, or, at the time of bronduring or setting and procedures are to when CDD must be completed, or, at the time of bronduring or setting and procedures are to when CDD must be completed, or at the setting and procedures are to when CDD must be completed, or at the setting and procedures are to when CDD must be completed and procedu		was completed.	
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76 d			Yes
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Test General Trading Companies EDD on risk-based approach			
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Always subject to EDD			
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76 Non-Government Organisations			Always subject to EDD
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78 Does EDD require senior business management and/or compliance approval? Yes			
compliance approval? Yes	78	Does EDD require senior business management and/or	
I AND		compliance approval?	Yes

78 a	If Y indicate who provides the approval:	Senior business management
79	Does the Entity have specific procedures for onboarding	
	entities that handle client money such as lawyers,	Yes
	accountants, consultants, real estate agents?	
80	Does the Entity perform an additional control or quality	Yes
	review on clients subject to EDD?	163
81	Confirm that all responses provided in the above Section	Yes
	are representative of all the LE's branches	
81 a	If N, clarify which questions the difference/s relate to	
	and the branch/es that this applies to	_
15		
82	If appropriate, provide any additional information/context	
	to the answers in this section.	
8. MONIT	ORING & REPORTING	
83	Does the Entity have risk based policies, procedures and	
	monitoring processes for the identification and reporting	Yes
	of suspicious activity?	
84	What is the method used by the Entity to monitor	Automated
	transactions for suspicious activities?	. (4.0)
84 a	If manual or combination selected, specify what type	
	of transactions are monitored manually	
84 b	If automated or combination selected, are internal	Vendor-sourced tools
	system or vendor-sourced tools used?	Veridor-sourced tools
84 b1	If 'Vendor-sourced tool' or 'Both' selected, what is	
	the name of the vendor/tool?	Espia System (AXON S.R.L.)
		Transaction Screening (SWIFT)
84 b2	When was the tool last updated?	1-2 years
84 b3	When was the automated Transaction Monitoring	
	application last calibrated?	1-2 years
85	Does the Entity have regulatory requirements to report	Van
-	suspicious transactions?	Yes
85 a	If Y, does the Entity have policies, procedures and	
	processes to comply with suspicious transaction	Yes
00	reporting requirements?	
86	Does the Entity have policies, procedures and processes	
	to review and escalate matters arising from the	Yes
0.7	monitoring of customer transactions and activity?	
87	Does the Entity have a data quality management	Vac
	programme to ensure that complete data for all transactions are subject to monitoring?	Yes
88	Does the Entity have processes in place to respond to	
	Request For Information (RFIs) from other entities in a	Yes
	timely manner?	
89	Does the Entity have processes in place to send	
	Requests for Information (RFIs) to their customers in a	Yes
	timely manner?	
90	Confirm that all responses provided in the above Section	Yes
00 -	are representative of all the LE's branches	
90 a	If N, clarify which questions the difference/s relate to	
	and the branch/es that this applies to	_
91	If appropriate, provide any additional information/context	
	to the answers in this section.	
		-
9. PAYME	NT TRANSPARENCY	
92	Does the Entity adhere to the Wolfsberg Group Payment	
	Transparency Standards?	Yes

93	Does the Entity have policies, procedures and processes to comply with and have controls in place to ensure compliance with:	
93 a	FATF Recommendation 16	Yes
93 b	Local Regulations	Yes
93 b1	If Y, specify the regulation	Instructivo Específico para Entidades de Intermediacion Financiera con Enfoque Basado en Gestión de Riesgos contra la Legitimación de Ganancias Ilicitas, el Financiamiento del Terrorismo y el Financiamiento de la Proliferación de Armas de Destrucción Masiva.
93 с	lf N, explain	
94	Does the Entity have controls to support the inclusion of	Van
95	required and accurate originator information in cross border payment messages? Does the Entity have controls to support the inclusion of	Yes
05 -	required beneficiary information cross-border payment messages?	Yes
95 a	If Y, does the Entity have procedures to include beneficiary address including country in cross border payments?	Yes
96	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
96 a	If N, clarify which questions the difference/s relate to	
	and the branch/es that this applies to.	-
97	If appropriate, provide any additional information/context to the answers in this section.	-
10. SANC	TIONS	
98	Does the Entity have a Sanctions Policy approved by management regarding compliance with sanctions law applicable to the Entity, including with respect to its business conducted with, or through accounts held at	Yes
	foreign financial institutions?	
99	Does the Entity have policies, procedures, or other controls reasonably designed to prevent the use of another entity's accounts or services in a manner causing the other entity to violate sanctions prohibitions applicable to the other entity (including prohibitions within the other entity's local jurisdiction)?	Yes
100	Does the Entity have policies, procedures or other controls reasonably designed to prohibit and/or detect actions taken to evade applicable sanctions prohibitions, such as stripping, or the resubmission and/or masking, of sanctions relevant information in cross border transactions?	Yes
101	Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists?	Yes
102	What is the method used by the Entity for sanctions screening?	Automated
102 a	If 'automated' or 'both automated and manual' selected:	
102 a1	Are internal system of vendor-sourced tools used?	Vendor-sourced tools
102 a1a	If a 'vendor-sourced tool' or 'both' selected, what is the name of the vendor/tool?	Transaction Screening - SWIFT
102 a2	When did you last test the effectiveness (of finding true matches) and completeness (lack of missing data) of the matching configuration of the automated tool? (If 'Other' please explain in	< 1 year
103	Does the Entity screen all sanctions relevant data, including at a minimum, entity and location information, contained in cross border transactions against Sanctions Lists?	Yes
104	What is the method used by the Entity?	Automated
105	Does the Entity have a data quality management programme to ensure that complete data for all	Yes
106	transactions are subject to sanctions screening? Select the Sanctions Lists used by the Entity in its	
106 a	sanctions screening processes: Consolidated United Nations Security Council	Used for screening customers and beneficial owners and for filtering transactional data
106 b	Sanctions List (UN) United States Department of the Treasury's Office of	Used for screening customers and beneficial owners and for filtering transactional data
106 c	Foreign Assets Control (OFAC) Office of Financial Sanctions Implementation HMT	Used for screening customers and beneficial owners and for filtering transactional data
	(OFSI)	Osed for screening customers and penelicial owners and for fillering transactional data

106 d	European Union Consolidated List (EU)	Used for screening customers and beneficial owners and for filtering transactional data
106 e	Lists maintained by other G7 member countries	Used for screening customers and beneficial owners and for filtering transactional data
106 f	Other (specify)	
		•
	140	
107	When regulatory authorities make updates to their	
	Sanctions list, how many business days before the entity	
	updates their active manual and/or automated screening	
	svstems against:	
107 a	Customer Data	Same day to 2 business days
107 b	Transactions	Same day to 2 business days
108	Does the Entity have a physical presence, e.g. branches,	
	subsidiaries, or representative offices located in	
		No
	G7 member countries have enacted comprehensive	
	jurisdiction-based Sanctions?	
109	Confirm that all responses provided in the above Section	
	are representative of all the LE's branches	Yes
109 a	If N, clarify which questions the difference/s relate to	
	and the branch/es that this applies to.	
		 -
110	Management of a consideration of the contract	
110	If appropriate, provide any additional information/context	
	to the answers in this section.	
		_
11. TRAIN	ING & EDUCATION	
111	Does the Entity provide mandatory training, which	
444	includes:	
111 a	Identification and reporting of transactions to	Yes
444.5	government authorities	
111 b	Examples of different forms of money laundering,	
	terrorist financing and sanctions violations relevant for	res
111 c	the types of products and services offered	
1116	Internal policies for controlling money laundering,	Yes
111 d	terrorist financing and sanctions violations	
111 0	New issues that occur in the market, e.g. significant	Yes
111.0	regulatory actions or new regulations	
111 e	Conduct and Culture	Yes
111 f	Fraud	Yes
112	Is the above mandatory training provided to :	
112 a	Board and Senior Committee Management	Yes
112 b	1st Line of Defence	Yes
112 c	2nd Line of Defence	Yes
112 d	3rd Line of Defence	Yes
112 e	Third parties to which specific FCC activities have	Not Applicable
	been outsourced	
112 f	Non-employed workers (contractors/consultants)	Not Applicable
113	Does the Entity provide AML, CTF & Sanctions training	
	that is targeted to specific roles, responsibilities and high	L.
	risk products, services and activities?	Yes
114	Does the Entity provide customised training for AML, CTF	
	and Sanctions staff?	Yes
114 a	If Y, how frequently is training delivered?	Other
115	Confirm that all responses provided in the above Section	
		Yes
	are representative of all the LE's branches	

115 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	-
116	If appropriate, provide any additional information/context to the answers in this section.	The employees of the entity receive continuous training, according to the functions they perform.
San Miller Inv	SCRUDANCE ICOMOUNTED FESTIVO	
	ASSURANCE /COMPLIANCE TESTING	
117	Does the Entity have a program wide risk based Quality Assurance programme for financial crime (separate from the independent Audit function)?	Yes
118	Does the Entity have a program wide risk based Compliance Testing process (separate from the independent Audit function)?	Yes
119	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
119 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	-
120	If appropriate, provide any additional information/context to the answers in this section.	
13. AUDIT		
121	In addition to inspections by the government supervisors/regulators, does the Entity have an internal audit function, a testing function or other independent third party, or both, that assesses FCC AML, CTF, ABC, Fraud and Sanctions policies and practices on a regular basis?	Yes
122	How often is the Entity audited on its AML, CTF, ABC, Fraud and Sanctions programme by the following:	
122 a	Internal Audit Department	Yearly
122 b	External Third Party	Yearly
123	Does the internal audit function or other independent third party cover the following areas:	
123 a	AML, CTF, ABC, Fraud and Sanctions policy and procedures Enterprise Wide Risk Assessment	Yes
123 C	Governance	Yes Yes
123 d	KYC/CDD/EDD and underlying methodologies	Yes
123 e	Name Screening & List Management	Yes
123 f	Reporting/Metrics & Management Information	Yes
123 g	Suspicious Activity Filing	Yes
123 h	Technology	Yes
123 i	Transaction Monitoring	Yes
123 j	Transaction Screening including for sanctions	Yes
123 k	Training & Education	Yes
123	Other (specify)	-
124	Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness?	Yes
125	Confirm that all responses provided in the above section are representative of all the LE's branches	Yes
125 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	-
126	If appropriate, provide any additional information/context to the answers in this section.	* Internal Audits are carried out twice a year. * In accordance with national regulations, Internal Audit and External Audit can only access to statistical information from Suspicious Operation Reports.
	to the answers in this section.	* In accordance with national regulations, Internal Audit and External Audit can only access to statistical
126 14. FRAUD 127	to the answers in this section.	* In accordance with national regulations, Internal Audit and External Audit can only access to statistical

129	Does the Entity have real time monitoring to detect fraud?	No	
130	Do the Entity's processes include gathering additional information to support its fraud controls, for example: IP address, GPS location, and/or device ID?	No	
131	Confirm that all responses provided in the above section are representative of all the LE's branches	Yes	
131 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	•	
132	If appropriate, provide any additional information/context to the answers in this section.	The entity is developing automated controls for Fraud Risk Management.	

Declaration Statement

Wolfsberg Group Correspondent Banking Due Diligence Questionnaire 2023 (CBDDQ V1.4)

Declaration Statement (To be signed by Global Head of Correspondent Banking or equivalent position holder AND Group Money Laundering Prevention Officer, Global Head of Anti- Money Laundering, Chief Compliance Officer, Global Head of Financial Crimes Compliance OR equivalent)

BANCO ECONOMICO S.A.

(Financial Institution name) is fully committed to the fight against financial crime and makes

every effort to remain in full compliance with all applicable financial crime laws, regulations and standards in all of the jurisdictions in which it does business and holds accounts.

The Financial Institution understands the critical importance of having effective and sustainable controls to combat financial crime in order to protect its reputation and to meet its legal and regulatory obligations.

The Financial Institution recognises the importance of transparency regarding parties to transactions in interplational payments and has adopted/is committed to adopting these standards.

The Financial Institution further certifies it complies with / is working to comply with the Wolfsberg Corres ndent Banking Principles and the Wolfsberg Trade Finance Principles. The information provided in this Wolfsberg CBDDQ will be kept current and will be updated no less frequently than ever eighteen months.

The Financial Institution commits to file accurate supplemental information on a timely basis.

Ser

SERGIO MAURICIO ASBUN SABA al Head of C espondent Banking or equivalent), certify that I have read and understood this declaration, that the answers provided in this Wolfsberg CBDDQ are complete and correct to my hone t belief, and that I am authorised to execute this declaration on behalf of the Financial Institution.

RAMIRO BORIS URIBE ALEMAN LRO or equ ent), certify that I have read and understood this declaration, that the answers provided in this Wolfsberg CBDDQ are complete and correct to my honest belief, and that I am authors of to execute this declaration on behalf of the Financial Institution.

November 25, 2024

November 25, 2024

(Signature Z Date)

(Signa) re & Date)

ATRO BORIS DRIBE ALEMAN

OBCERNIE HACTONAL

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Mauricio Asburi GERENTE GENERAL

BANCO ECONÓMICO S.A.