

CUSTOMER DUE
DILIGENCE
GUIDELINES
INTERBANK

Interbank, its shareholders, directors, executive officers and employees are bound to complying with Anti Money Laundering and Financing of Terrorism regulation in force, and are committed to implementing and following the Customer Due Diligence (CDD) policies described herein:

1. Identification

- Identification of personal information of new customers, including source of funds, employment status, age and purchasing power at the beginning of the commercial relationship is required by local regulation.
- For non-face-to-face customers the application of biometric controls are required.
- Additional information might be requested as proof of the source of funds depending on the purpose of the account.
- Interbank requires to identify the ultimate beneficial owner with whom a commercial relationship is established. The beneficial owner is the individual on whose behalf a transaction is conducted and/or who exercises the ultimate effective control over a customer in favor of whom an operation is conducted. It also includes the individual or individuals who effectively control a legal entity.

2. Verification

- Interbank performs identity verification procedures which include ensuring the accuracy of the information provided by customers, confirming the customers do not appear in sanctions lists and assessing risk factors to prevent money laundering, financing of terrorism, fraud and schemes.
- Verification is an automated process that is based on documentation provided by customers and information obtained from reliable independent and public sources. Documents presented by non-face-to-face customers will be validated by using local government data base, biometric tools and, if necessary, customers could be contacted by Interbank for additional verification.
- Interbank does not accept individuals or business customers that are on the following sanctions lists:
 - Office of Foreign Assets Control (OFAC) List.
 - European Union Terrorism Lists.
 - Lists related to the Financing of the Proliferation of Weapons of Mass Destruction, including, among others, United Nations Sanctions lists.
 - Other lists defined by local authorities.
- Interbank does not have or maintain anonymous accounts, products and/or services of any kind, as well as with fictitious or inaccurate names, or exclusively with codes.

3. Monitoring of operations

Since the monitoring of operations is one of the main mechanisms for the detection of unusual operations carried out by customers, Interbank has an automated rigorous and robust monitoring system.

This includes conducting ongoing due diligence of all business relationships and ongoing monitoring of accounts and transactions, using a risk-based approach to ensure the customer's behavior is consistent with their risk profile.



The AML Officer reports suspicious transactions to the local regulatory authority, based on local law and internal policies and procedures. This report must be confidential according to local regulation.

4. Enhanced Due Diligence (EDD)

In addition to the due diligence measures described above, enhanced due diligence applies a risk-based approach which requires an annual review for high-risk and sensitive customers performed by the Account Manager, which may involve contacting the customer by phone, email and/or onsite visits.

EDD also includes but is not limited to customer's transaction review, adverse media check, screening sanctions lists, obtaining additional information and review of supporting documents. An annual review questionnaire must be completed by the Account Manager and approved by the Senior Manager and the Compliance Department.

5. Politically Exposed Person (PEP)

PEP is defined as an individual who is or has been entrusted with a prominent public function, including heads of state or government, senior politicians, senior civil servants, judges or military officers, senior executives managing public sector companies, important political party officials, among others.

Family members up to second degree of consanguinity and affinity, and close associates are also considered high risk or sensitive customers.

Customers identified as PEP will keep this status indefinitely (once a PEP, always a PEP). As a high-risk or sensitive customer, PEPs are subject to enhanced due diligence procedures. In addition, the Account Manager is responsible for requesting the customer to provide the names of family members, close associates, and all business accounts where the PEP has more than 25% of ownership.

