

## Compliance Questionnaire

Financial Institution Name: Banco de Crédito del Perú

Location: Calle Centenario N° 156, Urb. Las Laderas de Melgarejo, La Molina, Lima - Perú

### I. Anti Money Laundering

#### 1. General AML Policies, Practices and Procedures:

		Yes	No
1.1	Is the AML compliance program approved by the FI's board or a senior committee?	X	
1.2	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	
1.3	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	
1.4	Who does the Compliance Officer report to?		
	The Compliance Officer reports to the Board of Directors.		
1.5	Has the FI developed written policies documenting the processes that they have in place to prevent, detect and report suspicious transactions?	X	
1.6	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	
1.7	Who is the regulatory entity of the FI? Indicate the web.		
	Superintendencia de Banca, Seguros y AFPs. <a href="http://www.sbs.gob.pe">www.sbs.gob.pe</a>		
1.8	How often does the regulatory body conduct an audit on the FI?		
	The regulatory audit is held annually.		
1.9	What is the frequency of the external audit? When was the last external audit?		
	The external audit is held annually. The last finished on November 2018.		
1.10	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	

		Yes	No
1.11	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	
1.12	Does the FI have a policy prohibiting third parties to have direct access to FI's correspondent accounts (payable through account)?	X	
1.13	Does the FI's AML/CTF/KYC have policies and procedures prohibiting opening or maintaining anonymous accounts?	X	
1.14	Does the FI have a policy prohibiting accounts / relationships with shell banks?	X	
1.15	Does the FI screen customers/transactions against applicable lists OFAC?	X	
1.16	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	
1.17	Does the FI have policies covering relationships with PEPs, their family and close associates?	X	
1.18	Does the FI have record retention procedures that comply with applicable law? How long are records retained?	X	
	10 years.		
1.19	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	
1.20	Does the FI have policies prohibiting other financial institutions to conduct transactions through its correspondent accounts (nested accounts)?	X	

## 2. Risk Assessment

		Yes	No
2.1	Does the FI have a risk-based assessment of its customer base and their transactions?	X	
2.2	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	

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

		Yes	No
3.1	Has the FI implemented processes for the identification of those customers on whose behalf it maintains or operates accounts or conducts transactions?	X	
3.2	Does the FI require identification and verification of beneficial owners? What percentage? 5%.	X	

		Yes	No
3.3	Does the FI have a requirement to collect information regarding its customers' business activities?	X	
3.4	Does the FI assess its customers' AML policies or practices?	X	
3.5	Does the FI have a process to review and, where appropriate, update customer information relating to high risk client information?	X	
3.6	Does the FI have procedures to establish a record for each new customer noting their respective identification documents and 'Know your customer' information?	X	
3.7	Does the FI complete a risk-based assessment to understand the normal and expected transactions of its customers?	X	

**4. Reportable Transactions and Prevention and Detection of Transactions with Illegally Obtained Funds**

		Yes	No
4.1	Does the FI have policies or practices for the identification and reporting of transactions that are required to be reported to the authorities?	X	
4.2	Where cash transaction reporting is mandatory, does the FI have procedures to identify transactions structured to avoid such obligations?	X	
4.3	Does the FI screen customers and transactions against lists of persons, entities or countries issued by government / competent authorities?	X	
4.4	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	
4.5	Does your AML program include monitoring client activities /transactions and applying due diligence in order to detect suspicious transactions?	X	
4.6	Does the FI report suspicious activity to the relevant authorities? Provide the name of the authorities.	X	
Unidad de Inteligencia Financiera del Perú			

5. Transaction Monitoring

		Yes	No
5.1	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	
5.2	Does the regulation of your institution require establishing procedures to monitor large cash deposits and withdrawals?	X	

6. AML Training

		Yes	No
6.1	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	
6.2	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).		
6.3	Does the FI retain records of its training sessions including attendance records and relevant training materials used?	X	
6.4	Does the FI communicate new AML related laws or changes to existing AML related policies or practices to relevant employees?	X	
6.5	Does the FI employ third parties to carry out some of functions of the FI?		X
6.6	If the answer to question 6.5 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
6.7	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	

## 7. Country Regulatory information

		Yes	No
7.1	Has your country established laws designed to prevent money laundering and terrorist financing and is your institution subject to such laws?	X	
7.2	If YES, please list the names of your country's relevant laws below	X	
	<ul style="list-style-type: none"> <li>• Ley N° 27693 issued on March 21<sup>st</sup>, 2002, which created the Financial Intelligence Unit of Perú and modified by Ley N° 28306.</li> <li>• D.S. N° 018-2006-JUS issued on July 21<sup>st</sup>, 2006.</li> <li>• Resolution SBS N° 838-2008 issued on March 28<sup>th</sup>, 2008.</li> <li>• Resolution SBS N° 11695-2008 issued on November 28<sup>th</sup>, 2008.</li> <li>• Resolution SBS N° 6561-2009 issued on June 22<sup>nd</sup>, 2009.</li> <li>• Resolution SBS N° 12565-2009 issued on September 7<sup>th</sup>, 2009.</li> <li>• Resolution SBS N° 2108-2011 issued on February 16<sup>th</sup>, 2011.</li> <li>• Resolution SBS N° 2660-2015 issued on May 14<sup>th</sup>, 2015.</li> <li>• Resolution SBS N° 4705-2017 issued on December 6<sup>th</sup>, 2017.</li> </ul> <p>For more information, please visit <a href="http://www.sbs.gob.pe/UIF/Leyes.asp?tipo=1">http://www.sbs.gob.pe/UIF/Leyes.asp?tipo=1</a></p>		
7.3	Has your institution had any regulatory or criminal enforcement actions resulting from violations of AML laws or regulations in the past five years?		X

## 8. Additional information

8.1	Tax Id. or Equivalent / Date of constitution
	RUC N° 20100047218 / 09/04/1889
8.2	Swift Address
	BCPLPEPL
8.3	Bank's web site
	<a href="http://www.viabcp.com">www.viabcp.com</a>
8.4	Registration / License
	License: Resolución SBS N° 5487-2009 (renewed June 7 <sup>th</sup> , 2009), granted by Superintendencia de Banca, Seguros y AFP ( <a href="http://www.sbs.gob.pe">www.sbs.gob.pe</a> )
8.5	Please list the principle countries in which your bank maintains branches, agencies and subsidiaries.
	<ul style="list-style-type: none"> <li>• BCP Miami Agency – Florida, USA</li> <li>• BCP Panama Branch – Panama, Rep. of Panama</li> </ul>

<b>8.6</b>	Is your institution publicly traded? If yes, on which exchange?																														
	Yes, BCP shares are traded on Lima Stock Exchange ( <a href="http://www.bvl.com.pe">www.bvl.com.pe</a> )																														
<b>8.7</b>	Please provide the names of any shareholder holding more than 10% of shares in your institution.																														
	Grupo Crédito S.A. (96.74%)																														
<b>8.8</b>	Please list the board of directors of your financial institution																														
	<table border="1"> <thead> <tr> <th>Name</th> <th>Position</th> </tr> </thead> <tbody> <tr> <td>Benavides Ganoza, Roque Eduardo</td> <td>Director</td> </tr> <tr> <td>Bruce Ventura, Barbara Cecilia</td> <td>Director</td> </tr> <tr> <td>Cigüeñas Guevara, Benedicto</td> <td>Director</td> </tr> <tr> <td>Fort Marie, Fernando</td> <td>Director</td> </tr> <tr> <td>Hochschild Beeck, Eduardo</td> <td>Director</td> </tr> <tr> <td>Lizarraga Guthertz, Patricia Silvia</td> <td>Director</td> </tr> <tr> <td>Montero Aramburu, Luis Enrique</td> <td>Director</td> </tr> <tr> <td>Morales Dasso, Jose Raimundo</td> <td>Vice President of the board</td> </tr> <tr> <td>Perez Monteverde, Martin</td> <td>Sustitute Director</td> </tr> <tr> <td>Pinasco Menchelli, Irzio Pietro Pruno</td> <td>Director</td> </tr> <tr> <td>Romero Belismelis, Luis Enrique</td> <td>Director</td> </tr> <tr> <td>Romero Paoletti, Dionisio</td> <td>Chairman</td> </tr> <tr> <td>Rubio Feijoo, Pedro</td> <td>Director</td> </tr> <tr> <td>Verme Giannoni, Juan Carlos</td> <td>Director</td> </tr> </tbody> </table>	Name	Position	Benavides Ganoza, Roque Eduardo	Director	Bruce Ventura, Barbara Cecilia	Director	Cigüeñas Guevara, Benedicto	Director	Fort Marie, Fernando	Director	Hochschild Beeck, Eduardo	Director	Lizarraga Guthertz, Patricia Silvia	Director	Montero Aramburu, Luis Enrique	Director	Morales Dasso, Jose Raimundo	Vice President of the board	Perez Monteverde, Martin	Sustitute Director	Pinasco Menchelli, Irzio Pietro Pruno	Director	Romero Belismelis, Luis Enrique	Director	Romero Paoletti, Dionisio	Chairman	Rubio Feijoo, Pedro	Director	Verme Giannoni, Juan Carlos	Director
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<b>8.9</b>	Name of Chief Executive Officer of the company																														
	Gianfanco Ferrari De Las Casas																														
<b>8.10</b>	Name of Legal Representative of the company																														
	Miriam Bottger Egg																														

## II. Anti - Corruption

		Yes	No
9.1	Does the Financial Institution have an established anti-corruption program?	X	
9.2	Has the Financial Institution defined anti-corruption policies and procedures? Have they been approved by the Board?	X	
9.3	Does the Financial Institution conduct a monitoring process to detect possible cases of non-compliance with anti-corruption policies?	X	
9.4	Does the Financial Institution carry out a specific training for staff on the anti-corruption policies of the organization?	X	

## III. Fiscal Transparency

		Yes	No
10.1	Does the Financial Institution comply with the Foreign Account Tax Compliant Act regulation (FATCA)?	X	
10.2	If the answer above is "Yes" please provide the FI GIIN Number and FATCA classification:  GIIN number: BDDJ0I.00000.LE.604 / Classification: Reporting Model 1 FFI.		
10.3	Does the Financial Institution comply with the Common Reporting Standard regulation (CRS)?	X	
10.4	If the answer above is "NO" please provide an explanation.		

Document approved on March 5th, 2019 by:

Bárbara Falero

Chief Compliance Officer