

ANTI-MONEY LAUNDERING AND KNOW YOUR CUSTOMER POLICY
GENERAL INFORMATION
BANCO INTERNACIONAL DEL PERU S.A.A. - INTERBANK
I. General information:

1.	Legal name:	Banco Internacional del Peru S.A.A.
2.	Shortened name:	Interbank
3.	Principal place of business:	Peru
4.	Number of banking license:	No. 612-80-EF/97-10
5.	Legal address:	Av. Carlos Villaran N° 140, Lima 13, Peru
6.	Website address:	www.interbank.com.pe
7.	SWIFT Code:	BINPPEPL
8.	Listed on:	Lima Stock Exchange (Bolsa de Valores de Lima - BVL)
9.	Supervisor authority:	Superintendency of Banking and Insurance (SBS)
10.	Regulatory authority:	Financial Intelligence Unit of Peru (UIF - Peru)
11.	US Patriot Act Certification:	www.interbank.com.pe/empresarial/comercio_exterior/certificado_us.htm

II. Anti-Money Laundering and Anti-Terrorist Financing (AML/ATF) Policy information:

1.	Is your Financial Institution (FI) subject to the governmental regulations to prevent and combat money laundering and terrorist financing?	YES
2.	Does your FI have a legal and regulatory compliance program to prevent and combat money laundering and terrorist financing that comply legal requirements and that includes a designated Compliance officer that is responsible for coordinating and overseeing the AML/ATF program on a day-to-day basis, which has been approved by senior management of the FI?	YES
3.	Does the AML/ATF compliance program require approval of the FI's Board or a senior committee thereof?	YES

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4.	Has the FI developed written policies documenting the processes that they have in place to prevent, detect and report suspicious transactions that has been approved by senior management?	YES
5.	Are your AML/ATF policies and procedures in line with the FATF (Financial Action Task Force on Money Laundering) recommendations?	YES
6.	In addition to inspections by the government supervisors/regulators, does the FI have an internal audit function or other independent third party that assesses AML/ATF policies and practices on a regular basis?	YES
7.	Does the FI 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
8.	Does the FI have policies covering relationships with politically exposed persons consistent with industry best practices?	YES
9.	Does the FI have appropriate record retention procedures pursuant to applicable law?	YES
10.	Does the FI require that its AML/ATF policies and practices be applied to all branches of the FI? <i>(*) Interbank does not have branches in locations outside of the home country.</i>	YES (*)

III. Risk Assessment:

1.	Does the FI have a risk focused assessment of its customer base and transactions of its customers?	YES
2.	Does the FI determine the appropriate level of 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?	YES

IV. Know Your Customer, Due Diligence and Enhanced Due Diligence:

1.	Has the FI implemented systems for the identification of its customers, including customer information in the case of recorded transactions, account opening, etc. (for example; name, nationality, street address, telephone number, occupation, age/ date of birth, number and type of valid official identification, as well as the name of the country/state that issued it)?	YES
2.	Does the FI obtain information about the source of wealth and the economic activity of its customers at the inception of the relationship?	YES
3.	Does the FI have reasonable measures to verify the information about the source of wealth and the economic activity of its customers?	YES
4.	Does the FI screen new account openings against certain lists associated with terrorism, money laundering and other illegal activities?	YES
5.	Does the FI offer accounts or services to anonymous customers?	NO

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6.	Does the FI have procedures to establish a record for each customer noting their respective identification documents and Know Your Customer information collected at account opening?	YES
7.	Does the FI take steps to understand the normal and expected transactions of its customers based on its risk assessment of its customers?	YES

V. Reportable transactions and prevention and detection of suspicious transactions:

1.	Does the FI have policies or practices for the identification and reporting of transactions that are required to be reported to the authorities?	YES
2.	Does the FI have procedures to identify transactions structured to avoid large cash reporting requirements?	YES
3.	Does the FI screen transactions for customers or transactions the FI deems to be of significantly high risk (which may include persons, entities or countries that are contained on lists issued by government/international bodies) that special attention to such customers or transactions is necessary prior to completing any such transactions?	YES
4.	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? (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
5.	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?	YES

VI. Transaction monitoring:

1.	Does the FI use a dedicated software to monitor its customers' activity?	YES
2.	Does the FI have a monitoring program for suspicious or unusual activity that covers funds transfers and monetary instruments (such as travelers checks, money orders, etc.)?	YES

VII. AML/ATF Training:

1.	Does the FI provide AML/ATF training to relevant employees that include identification and reporting of transactions that must be reported to government authorities, examples of different forms of money laundering involving the FI's products and services and internal policies to prevent money laundering?	YES
2.	Does the FI retain records of its training sessions including attendance records and relevant training materials used?	YES
3.	Does the FI have policies to communicate new AML/ATF related laws or changes to existing AML/ATF related policies or practices to relevant employees?	YES

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4.	Does the FI employ agents to carry out some of the functions of the FI and if so does the FI provide AML/ATF training to relevant agents that includes identification and reporting of transactions that must be reported to government authorities, examples of different forms of money laundering involving the FI's products and services and internal policies to prevent money laundering and terrorist financing?	NO
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VIII. Additional information:

1.	Has your institution had any regulatory or criminal enforcement actions resulting from violations of AML/ATF laws or regulations in the last five years?	NO
2.	Has your institution been subject of any investigation indictment, conviction or civil enforcement action related to financing terrorist in the last five years?	NO