## the Wolfsberg Group

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

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ublicly Traded (25% of shares publicly traded)	
	No
Y, indicate the exchange traded on and ticker	
mbol	
ember Owned/ Mutual	
erriber Owned/ Muldar	No
overnment or State Owned by 25% or more	
Transfer of State States by 25 % of more	No
rivately Owned	
	Yes
Y, provide details of shareholders or ultimate	
eneticial owners with a holding of 10% or more	SEE ATTACHE 2
of the Entity's total charge company of	
earer shares	
	N/A
pes the Entity, or any of its branches, operate	
ider an Offshore Banking License (OBL) ?	No
Y, provide the name of the relevant branch/es	
iich operate under an OBL	
arrie or nomany transcial regulator / access	
rthority	AUTORIDAD DE SUPERVISIÓN DEL SISTEMA FINANCIERO - ASFI
rthority	II. IS TO THE SECON ENVISION DEL SISTEMA FINANCIERO - ASFI
Y Y Y Y Y Y Y Y Y Y Y Y Y Y Y Y Y Y Y	r, provide details of shareholders or ultimate neficial owners with a holding of 10% or more of the Entity's total shares composed of arer shares  es the Entity, or any of its branches, operate der an Offshore Banking License (OBL)?  7, provide the name of the relevant branch/es ich operate under an OBL.

10	Provide Legal Entity Identifier (LEI) if available	
11	Provide the full legal name of the ultimate parent (if different from the Entity completing the DDQ)	N/A
12	Jurisdiction of licensing authority and regulator of ultimate parent	BOLIVIA
13	Select the business areas applicable to the Entity	
13 a	Retail Banking	Yes
13 b	Private Banking / Wealth Management	No
13 c	Commercial Banking	Yes
13 d	Transactional Banking	Yes
13 e	Investment Banking	No
13 f	Financial Markets Trading	No
13 g	Securities Services / Custody	No
13 h	Broker / Dealer	No
13 i	Multilateral Development Bank	No
13 j	Other	-
14	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
14 a	If Y, provide the top five countries where the non- resident customers are located.	
15	Select the closest value:	
15 a	Number of employees	1001-5000
15 b	Total Assets	Greater than \$500 million
16	Confirm that all responses provided in the above Section ENTITY & OWNERSHIP are representative of all the LE's branches	Yes
16 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
16 b	If appropriate, provide any additional information / context to the answers in this section.	

	DUCTS & SERVICES	
17	Does the Entity offer the following products and services:	
17 a	Correspondent Banking	No
17 a1	If Y	
17 a2	Does the Entity offer Correspondent Banking services to domestic banks?	No
17 a3	Does the Entity allow domestic bank clients to provide downstream relationships?	No
17 a4	Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks?	No
17 a5	Does the Entity offer correspondent banking services to Foreign Banks?	No
17 a6	Does the Entity allow downstream relationships with Foreign Banks?	No
17 a7	Does the Entity have processes and procedures in place to identify downstream relationships with Foreign Banks?	No
17 a8	Does the Entity offer correspondent banking services to regulated MSBs/MVTS?	No
17 a9	Does the Entity allow downstream relationships with MSBs/MVTS?	No
17 a10	Does the Entity have processes and procedures in place to identify downstream relationships with MSB /MVTS?	No
17 b	Private Banking (domestic & international)	No
17 c	Trade Finance	Yes
17 d	Payable Through Accounts	No
17 e	Stored Value Instruments	No
17 f	Cross Border Bulk Cash Delivery	No
17 g	Domestic Bulk Cash Delivery	No
17 h	International Cash Letter	No
17 i	Remote Deposit Capture	No
17 j	Virtual /Digital Currencies	No
17 k	Low Price Securities	No
17 I	Hold Mail	No
17 m	Cross Border Remittances	Yes
17 n	Service to walk-in customers (non-account holders)	No
17 o	Sponsoring Private ATMs	No
17 p	Other high risk products and services identified by the Entity	
18	Confirm that all responses provided in the above Section PRODUCTS & SERVICES are representative of all the LE's branches	Yes
18 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
18 b	If appropriate, provide any additional information / context to the answers in this section.	

3. AMI	, CTF & SANCTIONS PROGRAMME	
19		
19	Does the Entity have a programme that sets	
	minimum AML, CTF and Sanctions standards	·
	regarding the following components:	
19 a	Appointed Officer with sufficient	Yes
	experience/expertise	165
19 b	Cash Reporting	
		Yes
19 c	CDD	
		Yes ·
19 d	EDD	
		Yes
19 e	Beneficial Ownership	
		Yes
19 f	Independent Testing	
		Yes
19 g	Periodic Review	
,	i diladia (Ceria)	Yes
19 h	Policies and Procedures	
19 11	Policies and Procedures	Yes
40.1		
19 i	Risk Assessment	Yes
		163
19 j	Sanctions	Yes
		res
19 k	PEP Screening	
		Yes
19 1	Adverse Information Screening	
		Yes
19 m	Suspicious Activity Reporting	
	Table and Account Accounts	Yes
19 n	Training and Education	
'""	Training and Education	Yes
19 o	Transaction Monitoring	
1130	Transaction worldoning	Yes
20	11	
20	How many full time employees are in the Entity's	
	AML, CTF & Sanctions Compliance	10-50
-	Department?	
21	Is the Entity's AML, CTF & Sanctions policy	
l	approved at least annually by the Board or	Yes
	equivalent Senior Management Committee?	
22	Does the Board or equivalent Senior	
l	Management Committee receive regular	loured war and
l	reporting on the status of the AML, CTF &	Quarterly/Every three months
	Sanctions programme?	
23	Does the Entity use third parties to carry out any	
l	components of its AML, CTF & Sanctions	No
	programme?	
23 a	If Y, provide further details	
1		
l		-
l		
24	Confirm that all responses provided in the above	
	Section AML, CTF & SANCTIONS Programme	
1	are representative of all the LE's branches	Yes
1	The secondary of all the LE's branches	
24 a	If N, clarify which questions the difference/s	
"	relate to and the branch/es that this applies to.	
1	relate to and the braillenies that this applies to.	L.
1		
24 b	If appropriate, provide any additional information	
l	/ context to the answers in this section.	
l		-

4. AN	I BRIBERY & CORRUPTION	
25	Has the Entity documented policies and	
23	procedures consistent with applicable ABC	
		L.
	regulations and requirements to [reasonably]	Yes
	prevent, detect and report bribery and	
	corruption?	
26	Does the Entity have an enterprise wide	Vac
	programme that sets minimum ABC standards?	Yes
27	Has the Entity appointed a designated officer or	
	officers with sufficient experience/expertise	
	responsible for coordinating the ABC	Yes
	programme?	
28		
20	Does the Entity have adequate staff with	
	appropriate levels of experience/expertise to	Yes
	implement the ABC programme?	
29	Is the Entity's ABC programme applicable to:	
		Both joint ventures and third parties acting on behalf of the Entity
30	Does the Entity have a global ABC policy that:	
	a soo and analy have a global Abo policy that.	
20 -	Darkitia de al la companya de la com	
30 a	Prohibits the giving and receiving of bribes? This	
	includes promising, offering, giving, solicitation or	
	receiving of anything of value, directly or	Yes
	indirectly, if improperly intended to influence	
	action or obtain an advantage	
30 b	Includes enhanced requirements regarding	
	interaction with public officials?	Yes
30 c	Includes a prohibition against the falsification of	
30 C		
	books and records (this may be within the ABC	Yes
	policy or any other policy applicable to the Legal	
	Entity)?	
31	Does the Entity have controls in place to monitor	
	the effectiveness of their ABC programme?	Yes
32	Does the Entity's Board or Senior Management	
0 <u>1</u>	Committee receive regular Management	L.
	Lefe-menting and ADO (1)	Yes
_	Information on ABC matters?	
33	Does the Entity perform an Enterprise Wide ABC	Yes
	risk assessment?	res
33 a	If Y select the frequency	
	,	12 Months
34	Does the Entity have an ABC residual risk rating	
34	boes the Entity have all ABC residual risk rating	
	that is the net result of the controls effectiveness	Yes
	and the inherent risk assessment?	
35	Does the Entity's ABC EWRA cover the inherent	
	risk components detailed below:	
35 a	Potential liability created by intermediaries and	
	other third-party providers as appropriate	Yes
35 b	Corruption risks associated with the countries	
,	and industries in which the Entity does business,	Mag.
	directly or through intermediaries	res
25.		
35 с	Transactions, products or services, including	
	those that involve state-owned or state-	Yes
	controlled entities or public officials	
35 d	Corruption risks associated with gifts and	
	hospitality, hiring/internships, charitable	No.
		Yes
_	donations and political contributions	
35 е	Changes in business activities that may	Voc
	materially increase the Entity's corruption risk	Yes
36	Does the Entity's internal audit function or other	
	independent third party cover ABC Policies and	Yes
	Procedures?	100
	Procedures?	100

37	Does the Entity provide mandatory ABC training to:	
37 a	Board and senior Committee Management	Yes
37 b	1st Line of Defence	Yes
37 c	2nd Line of Defence	Yes
37 d	3rd Line of Defence	Yes
37 e	3rd parties to which specific compliance activities subject to ABC risk have been outsourced	Not Applicable
37 f	Non-employed workers as appropriate (contractors/consultants)	Not Applicable
38	Does the Entity provide ABC training that is targeted to specific roles, responsibilities and activities?	Yes
39	Confirm that all responses provided in the above Section Anti Bribery & Corruption are representative of all the LE's branches	Yes
39 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
39 b	If appropriate, provide any additional information / context to the answers in this section.	

	CTF & SANCTIONS POLICIES & PROCE	DURES
40	Has the Entity documented policies and	
	procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report:	
40 a	Money laundering	Yes
40 b	Terrorist financing	Yes
40 c	Sanctions violations	Yes
41	Are the Entity's policies and procedures updated	Yes
42	at least annually?  Are the Entity's policies and procedures gapped	
42 a	against/compared to: US Standards	Yes
42 a1	If Y, does the Entity retain a record of the	
42 b	results?	Yes
42 b1	If Y, does the Entity retain a record of the	Yes
	results?	Yes
43	Does the Entity have policies and procedures that:	
43 a	Prohibit the opening and keeping of anonymous and fictitious named accounts	Yes
43 b	Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs	Yes
43 c	Prohibit dealing with other entities that provide banking services to unlicensed banks	Yes
43 d	Prohibit accounts/relationships with shell banks	Yes
43 e	Prohibit dealing with another entity that provides services to shell banks	Yes
43 f	Prohibit opening and keeping of accounts for Section 311 designated entities	Yes
43 g	Prohibit opening and keeping of accounts for any of unlicensed/unregulated remittance agents, exchanges houses, casa de cambio, bureaux de change or money transfer agents	Yes
43 h	Assess the risks of relationships with domestic and foreign PEPs, including their family and close associates	Yes
43 i	Define escalation processes for financial crime risk issues	Yes
43 j	Define the process, where appropriate, for terminating existing customer relationships due to financial crime risk	Yes
43 k	Specify how potentially suspicious activity identified by employees is to be escalated and investigated	Yes
43 1	Outline the processes regarding screening for sanctions, PEPs and negative media	Yes
43 m	Outline the processes for the maintenance of internal "watchlists"	Yes
44	Has the Entity defined a risk tolerance statement or similar document which defines a risk	Yes
45	Does the Entity have a record retention	Yes
45 a	procedures that comply with applicable laws?  If Y, what is the retention period?	
46	Confirm that all responses provided in the above Section POLICIES & PROCEDURES are representative of all the LE's branches	5 years or more Yes
46 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
46 b	If appropriate, provide any additional information / context to the answers in this section.	

6. AMI	, CTF & SANCTIONS RISK ASSESSMEN	The state of the s
47	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:	
47 a	Client	Yes
47 b	Product	Yes
47 c	Channel	Yes
47 d	Geography	Yes
48	Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below:	
48 a	Transaction Monitoring	Yes
48 b	Customer Due Diligence	Yes
48 c	PEP Identification	Yes
48 d	Transaction Screening	Yes
48 e	Name Screening against Adverse Media & Negative News	Yes
48 f	Training and Education	Yes
48 g	Governance	Yes
48 h	Management Information	Yes
49	Has the Entity's AML & CTF EWRA been completed in the last 12 months?	Yes
49 a	If N, provide the date when the last AML & CTF EWRA was completed.	-
50	Does the Entity's Sanctions EWRA cover the inherent risk components detailed below:	
50 a	Client	Yes
50 b	Product	Yes
50 c	Channel	Yes
50 d	Geography	Yes

51	Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below:	Yes
51 a	Customer Due Diligence	Yes
51 b	Transaction Screening	Yes
51 c	Name Screening	Yes
51 d	List Management	Yes
51 e	Training and Education	Yes
51 f	Governance	Yes
51 g	Management Information	Yes
52	Has the Entity's Sanctions EWRA been completed in the last 12 months?	Yes
52 a	If N, provide the date when the last Sanctions EWRA was completed.	
53	Confirm that all responses provided in the above Section AML, CTF & SANCTIONS RISK ASSESSMENT are representative of all the LE's branches	Yes
53 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	-
53 b	If appropriate, provide any additional information / context to the answers in this section.	

	C, CDD and EDD	
54	Does the Entity verify the identity of the customer?	Yes
55	Do the Entity's policies and procedures set out when CDD must be completed, e.g. at the time of onboarding or within 30 days	Yes
56	Which of the following does the Entity gather and retain when conducting CDD? Select all that apply:	
56 a	Ownership structure	Yes
56 b	Customer identification	Yes
56 c	Expected activity	Yes
56 d	Nature of business/employment	Yes
56 e	Product usage	Yes
56 f	Purpose and nature of relationship	Yes
56 g	Source of funds	Yes
56 h	Source of wealth	Yes
57	Are each of the following identified:	
57 a	Ultimate beneficial ownership	Yes
57 a1	Are ultimate beneficial owners verified?	Yes
57 b	Authorised signatories (where applicable)	Yes
57 c	Key controllers	Yes
57 d	Other relevant parties	
58	What is the Entity's minimum (lowest) threshold applied to beneficial ownership identification?	5%
59	Does the due diligence process result in customers receiving a risk classification?	Yes

60	If Y, what factors/criteria are used to determine the customer's risk classification? Select all that apply:	
60 a	Product Usage	Yes
60 b	Geography	Yes
60 c	Business Type/Industry	Yes
60 d	Legal Entity type	Yes
60 e	Adverse Information	
60 f	Other (specify)	Yes
	Catal (Specify)	Products contracted, Channels used.
61	Does the Entity have a risk based approach to screening customers for adverse media/negative news?	Yes
62	If Y, is this at:	
62 a	Onboarding	Yes .
62 b	KYC renewal	Yes
62 c	Trigger event	Yes
63	What is the method used by the Entity to screen for adverse media / negative news?	Combination of automated and manual
64	Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?	Yes
65	If Y, is this at:	
65 a	Onboarding	Yes
65 b	KYC renewal	Yes
65 c	Trigger event	Yes
66	What is the method used by the Entity to screen PEPs?	Combination of automated and manual
67	Does the Entity have policies, procedures and processes to review and escalate potential matches from screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?	Yes
68	Does the Entity have a process to review and update customer information based on:	
68 a	KYC renewal	Yes
68 b	Trigger event	Yes
69	Does the Entity maintain and report metrics on current and past periodic or trigger event due diligence reviews?	Yes

	I= 0.001		
70	From the list below, which categories of customers or industries are subject to EDD and/or are restricted, or prohibited by the Entity's FCC programme?		
70 a	Non-account customers	Prohibited	
70 b	Non-resident customers	phibited	
70 c	Shell banks	rohibited	
70 d	MVTS/ MSB customers	DD on a risk based approach	
70 e	PEPs	EDD on a risk based approach	
70 f	PEP Related	EDD on a risk based approach	
70 g	PEP Close Associate	EDD on a risk based approach	
70 h	Correspondent Banks	EDD on a risk based approach	
70 h1	If EDD or EDD & restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2014?	Yes	
70 i	Arms, defense, military	Prohibited	
70 j	Atomic power	Prohibited	
70 k	Extractive industries	Prohibited	
70 I	Precious metals and stones	EDD on a risk based approach	
70 m	Unregulated charities	Prohibited	
70 n	Regulated charities	EDD on a risk based approach	
70 o	Red light business / Adult entertainment	Prohibited	
70 p	Non-Government Organisations	EDD on a risk based approach	
70 q	Virtual currencies	Prohibited	
70 r	Marijuana	Prohibited	
70 s	Embassies/Consulates	EDD on a risk based approach	
70 t	Gambling	Prohibited	
70 u	Payment Service Provider	EDD on a risk based approach	
70 v	Other (specify)	EDD on a risk based approach: People dedicated to the real estate sector.  Prohibited: People dedicated to: Buy / Sell Forex illegally.	
71	If restricted, provide details of the restriction		
72	Does the Entity perform an additional control or quality review on clients subject to EDD?	Yes	
73	Confirm that all responses provided in the above Section KYC, CDD and EDD are representative of all the LE's branches	Yes	
73 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to	-	
73 b	If appropriate, provide any additional information		

74	Does the Entity have risk based policies,	
	procedures and monitoring processes for the identification and reporting of suspicious activity?	Yes
75	What is the method used by the Entity to monitor transactions for suspicious activities?	Automated
76	If manual or combination selected, specify what type of transactions are monitored manually	-
77	Does the Entity have regulatory requirements to report suspicious transactions?	Yes
77 a	If Y, does the Entity have policies, procedures and processes to comply with suspicious transaction reporting requirements?	Yes
78	Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity?	Yes
79	Confirm that all responses provided in the above Section MONITORING & REPORTING are representative of all the LE's branches	Yes
79 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to	
79 b	If appropriate, provide any additional information / context to the answers in this section.	-

9. PAY	MENT TRANSPARENCY	
80	Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards?	Yes
81	Does the Entity have policies, procedures and processes to [reasonably] comply with and have controls in place to ensure compliance with:	
81 a	FATF Recommendation 16	Yes
81 b	Local Regulations	Yes
81 b1	Specify the regulation	Resolución UIF/063/2019 – Instructivo Específico para Entidades de Intermediación Financiera, con enfoque basado en gestión de Riesgos sobre Legitimación de Ganancias Ilícita, Financiamiento del Terrorismo y Delitos Precedentes.
81 c	If N, explain	-
82	Does the Entity have processes in place to respond to Request For Information (RFIs) from other entities in a timely manner?	Yes
83	Does the Entity have controls to support the inclusion of required and accurate originator information in international payment messages?	Yes
84	Does the Entity have controls to support the inclusion of required beneficiary information international payment messages?	Yes
85	Confirm that all responses provided in the above Section PAYMENT TRANSPARENCY are representative of all the LE's branches	Yes
85 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	-
85 b	If appropriate, provide any additional information / context to the answers in this section.	Complementing 81.b1: Resolución UIF № 023/2013 - Instructivo de Congelamiento y Descongelamiento preventivo de Fondos y otros Activos.

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)?  88 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?  89 Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists?  90 What is the method used by the Entity?  Automated  91 Does the Entity screen all sanctions relevant data, including at a minimum, entity and location information, contained in cross border transactions against Sanctions Lists?  92 What is the method used by the Entity?  Automated		
approved by management regarding compliance with sanctions law applicable to the Entity, including with respect its business conducted with, or through accounts held at foreign financial institutions?  87 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)?  88 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?  89 Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists?  90 What is the method used by the Entity?  Does the Entity screen all sanctions relevant data, including at a minimum, entity and location information, contained in cross border transactions against Sanctions Lists?  What is the method used by the Entity?  Automated		
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93 Select the Sanctions Lists used by the Entity in		
its sanctions screening processes:		
93 a Consolidated United Nations Security Council Used for screening customers and beneficial owners and for filte	sing transpetional data	
Carioticino Elet (City)	Ting transactional data	
93 b United States Department of the Treasury's Office of Foreign Assets Control (OFAC) Used for screening customers and beneficial owners and for filte	ring transactional data	
Chief of Artificial Control (Cr AC)	ning transactional data	
93 c Office of Financial Sanctions Implementation	Used for screening customers and beneficial owners and for filtering transactional data	
	ring transactional data	
93 d European Union Consolidated List (EU)		
Used for screening customers and beneficial owners and for filte	ring transactional data	
93 e Lists maintained by other G7 member countries		
Used for screening customers and beneficial owners and for filte	ring transactional data	
93 f Other (specify)		
94 Question removed	TREESENCE SERVICE IN	
95 When regulatory authorities make updates to		
their Sanctions list, how many business days		
before the entity updates their active manual		
and/or automated screening systems against:		
95 a Customer Data		
.		
Same day to 2 business days		
95 b Transactions		
Same day to 2 business days		

96	Does the Entity have a physical presence, e.g., branches, subsidiaries, or representative offices located in countries/regions against which UN, OFAC, OFSI, EU and G7 member countries have enacted comprehensive jurisdiction-based Sanctions?	No
97	Confirm that all responses provided in the above Section SANCTIONS are representative of all the LE's branches	Yes
97 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
97 b	If appropriate, provide any additional information / context to the answers in this section.	-

11. TR	1. TRAINING & EDUCATION		
98	Does the Entity provide mandatory training, which includes :		
98 a	Identification and reporting of transactions to government authorities	Yes	
98 b	Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered	Yes	
98 c	Internal policies for controlling money laundering, terrorist financing and sanctions violations	Yes	
98 d	New issues that occur in the market, e.g., significant regulatory actions or new regulations	Yes	
98 e	Conduct and Culture	Yes	
99	Is the above mandatory training provided to :		
99 a	Board and Senior Committee Management	Yes	
99 b	1st Line of Defence	Yes	
99 c	2nd Line of Defence	Yes	
99 d	3rd Line of Defence	Yes	
99 e	3rd parties to which specific FCC activities have been outsourced	Not Applicable	
99 f	Non-employed workers (contractors/consultants)	Not Applicable	
100	Does the Entity provide AML, CTF & Sanctions training that is targeted to specific roles, responsibilities and high risk products, services and activities?	Yes	
101	Does the Entity provide customised training for AML, CTF and Sanctions staff?	Yes	
102	Confirm that all responses provided in the above Section TRAINING & EDUCATION are representative of all the LE's branches	Yes	
102 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	-	
102 b	If appropriate, provide any additional information / context to the answers in this section.	The Bank provides face-to-face and non-face-to-face training on an ongoing basis	

103	Are the Entity's KYC processes and documents subject to quality assurance testing?	Yes
104	Does the Entity have a program wide risk based Compliance Testing process (separate to the independent Audit function)?	Yes
105	Confirm that all responses provided in the above Section QUALITY ASSURANCE / COMPLIANCE TESTING are representative of all the LE's branches	Yes
105 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	-
105 b	If appropriate, provide any additional information / context to the answers in this section.	

13. AU	DIT CONTRACTOR OF THE PARTY OF	with the triangular confirmation was more many than the street when the triangular confirmation and the street with the street of the street with the street of the street
106	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 and Sanctions policies and practices on a regular basis?	Yes
107	How often is the Entity audited on its AML, CTF & Sanctions programme by the following:	
107 a	Internal Audit Department	Yearly
107 b	External Third Party	Yearly
108	Does the internal audit function or other independent third party cover the following areas:	
108 a	AML, CTF & Sanctions policy and procedures	Yes
108 b	KYC / CDD / EDD and underlying methodologies	Yes
108 c	Transaction Monitoring	Yes
108 d	Transaction Screening including for sanctions	Yes
108 e	Name Screening & List Management	Yes
108 f	Training & Education	Yes
108 g	Technology	Yes
108 h	Governance	Yes
108 i	Reporting/Metrics & Management Information	Yes
108 j	Suspicious Activity Filing	Yes
108 k	Enterprise Wide Risk Assessment	Yes
108 [	Other (specify)	
109	Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness?	Yes
110	Confirm that all responses provided in the above section, AUDIT are representative of all the LE's branches	Yes
110 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
110 b	If appropriate, provide any additional information / context to the answers in this section.	According to national regulations, the Internal Audit is carried out twice a year.

Declaration Statement //
Wolfsberg Group Correspondent Banking Due Diligence Questionnaire 2020 (CBDDQ V1.3)
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 Confes 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 lews, regulations and standards in all of the jurisdictions in which it does business and holds accounts.
The state of the s
The Financial Institution understands the critical importance of having affective 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 international payments and has adopted/is committed to adopting these
standards.
The Eingerial Institution further contifies it complies with //s and // see
The Financial Institution further certifies it complies with / is working to comply with the Wolfsberg Correspondent 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 on an annual basis.
The mental of provided in districtions of a state of the
The Financial Institution commits to file accurate supplemental information on a timety basis.
SEP ERENTE STANDARD
SERGIO MAURICIO ASBUN SABA
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SERGIO MAURICIO ASBUN SABA  (Globel less of Corresponds Denking or equivalent), certify that I have read and understood this declaration, that the answers provided in this Wolfsberg CBDDO are complete and correct or my hoads white an understand to execute this declaration on behalf of the Financial Institution.  RAMIRO BORIS URIBE ALEMAN  (Minute of equipped and correct to my honest belie), and that am a understand the read and understood this declaration, that the answers provided in this Wolfsberg CBDDQ are complete and correct to my honest belie), and that am a understand the declaration on behalf of the Financial Institution.  O1/26/2023  (Signatures) Dite)
Institution. RAMIRO BORIS URIBE ALEMAN
The second secon
Wolfsberg CBDDQ are complete and correct to my honest belief, and that are provided in this declaration on behalf of the Financial Institution
Avoisberg obbod are complete and correct to my notices being and made an accuracy to decute this declaration on behalf of the Financial Institution.
01/26/2023
(Signature Alle)
01/26/2023
01/20/2023
(Signature & Date)



## Banco Económico S.A. Listado de Sucursales y Agencias

Nro.	Santa Cruz	Dirección	
1	Abasto + Mi Socio UN	Av. Roque Aguilera y Avenida Piraí, Zona Mercado Abasto	
2	Alto San Pedro + Mi Socio UN	Av. Roque Aguilera y Avenida Prefecto Rivas, Alto San Pedro	
3	Cuatro Cañadas	Jrbanización Campo Verde, Localidad Colonia Memonita Valle Esperanza,	
4	Grigotá + Mi Socio UN	Avenida Grigotá esquina Calle Menbiray, entre Segundo y Tercer Anillo, frente Surtidor El Pari.	
5	Hipermaxi Doble Vía a La Guadia	venida Doble Vía a La Guardia y Cuarto Anillo, Supermercado Hipermaxi	
6	Hipermaxi Equipetrol	Avenida San Martin y Cuarto Anillo predios del Hipermaxi Equipetrol	
7	Hipermaxi Norte	Avenida Banzer y Tercer Anillo Interno, Supermercado Hipermaxi.	
8	Hipermaxi Roca y Coronado	Avenida Roca y Coronado entre Tercer y Cuarto Anillo	
9	Hipermaxi Super Center	Avenida Banzer, pasando Sexto Anillo, Supermercado Hipermaxi	
10	Hipermaxi Sur	Avenida Santos Dumont y Tercer Anillo, Supermercado Hipermaxi.	
_11_	Hipermaxi Tres Pasos al Frente	Avenida Tres Pasos al Frente, Tercer Anillo, Supermercado Hipermaxi.	
12	La Ramada + Mi Socio UN	Avenida Isabel La Católica # 665.	
13	Montero + Mi Socio UN	Avenida Circunvalación frente al Mercado Germán Moreno.	
14	Mutualista + Mi Socio UN	Tercer Anillo Interno esquina Calle Buena Vista.	
15	Oficina Central	Calle Ayacucho, # 166.	
16	Pampa de la Isla + Mi Socio UN	Avenida Virgen de Cotoca, Sexto Anillo, Zona Pampa de la Isla.	
17	Paragua	Avenida Paraguá y Cuarto Anillo. Plaza Comercial Paragua	
18	Plan Tres Mil + Mi Socio UN	Avenida Principal esquina Calle 1, Barrio Toro Toro, Plan Tres Mil	
19	Siete Calles + Mi Socio UN	Calle Camiri, casi Calle Suarez de Figueroa, Plazuela Colón.	
20	Villa Primero de Mayo + Mi Socio UN	Avenida Principal Villa Primero de Mayo, Calle 5 Oeste, en la Plaza Principal de la Villa Primero de Mayo.	
21	Yapacani + Mi Socio UN	Avenida Epifanio Rios entre Avenida Buenos Aires y Calle Ayacucho, Barrio Abaroa.	
22	Ingavi (BEC CAFÉ)	Calle Ingavi, # 143 entre Calle Independencia y Calle Velasco	
23	Abasto Mayorista	Avenida Doble Via La Guardia entre 8 vo y 9 no Anillo, en las isntalaciones del Mercado Mayorista Abasto Sur.	
24	Oficina Externa Trigal	Calle Bolivar esquina calle comercio	
25	Agencia Blacutt	Av. Velarde esquina calle soliz de olguin, frente a la Plazuela Blacutt	
26	UNIVALLE Santa Cruz	Septimo Anillo, Avenida Cristo Redentor Campus Universitario Univalle	
27	Agencia Hipermaxi Cambodromo	Av. Mutualista, Sexto Anillo, zona Cambodrmo, en los predios Hipermaxi	
Nro.	La Paz	Dirección	
1	Oficina Central	Avenida 6 de Agosto, esquina Calle Campos, # 296.	
2	Camacho	Avenida Camacho # 1245	
3	Tumusla + Mi Socio UN	Avenida Baptista # 1070, zona 14 de Septiembre	
4	La Ceja + Mi Socio UN	Calle Jorge Carrasco # 2112, esquina 3, La Ceja, Zona 12 de Octubre.	
5	16 de Julio + Mi Socio UN	Avenida Alfonso Ugarte # 250, a 3 cuadras de la Avenida Juan Pablo II, Zona 16 de Julio.	
6	Villa Adela Mi Socio UN	Avenida Ladislao Cabrera # 8, Cruce Villa Adela.	
7	Rio Seco + Mi Socio UN	Avenida Juan Pablo II, Ex tranca Rio Seco, Calle 6 # 3020, Villa Brasil	
8	Villa Fatima	Avenida Tejada Sorzano # 258	
9	San Miguel	Avenida Montenegro # 957, Edificio Torre Montenegro	



Nro.	Cochabamba	Dirección	
1	Oficina Central	Calle Nataniel Aguirre S-0459	
2	Hipermaxi Juan de la Rosa	Avenida Juan de la Rosa esquina Calle Gabriel René Moreno.Supermercado Hipermaxi	
3	La Cancha + Mi Socio UN	Calle Honduras # 561 entre Ave. San Martín y Calle Lanza, La Cancha	
4	Norte + Mi Socio UN	Avenida América Este # 22, entre Calle Tarija y Avenida Gualberto Villarroel, Cala Cala	
5	Quillacollo + Mi Socio UN	Calle Jose Ballivián # S-0137 esquina Calle Grl. Pando, Plazuela Bolivar	
6	Sacaba + Mi Socio UN	Calle Tapia # 427, a media cuadra Plaza Principal	
7	Blanco Galindo + Mi Socio UN	Avenida Blanco Galindo # 1.080, entre Calle San Alberto y Calle Fransisco Viedma	
8	Hipermaxi Prado	Avenida Ballivian# 753 entre Calle Oruro y Calle La Paz predios del supermercado Hipermaxi Prado	
9	Tolata	Plaza Turística 13 de Septiembre acera Oeste, carretera al Valle Alto Km.33, en instalaciones de la Alcaldia de Tolata", Municipio de Tolata	
10	Hipermaxi Villazon	Avenida Villazón Km.3, zona El Castillo, predios del Supermercado Hipermaxi Villazón	
11	Recoleta (BEC CAFÉ)	Avenida Pando esquina Pasaje Portales	
12	Тосо	Calle Linares s/n, entre Francisco Rivero y Enrique Jiménez, Plaza Principal de Toco	
13	Sacabamba	Calle 6 de Agosto # 010, a una cuadra de la Plaza Principal de Sacabamba.	
14	Hipermaxi Circunvalación	Av. Circunvalación entre pasajes Rafael Canedo y A.Uzeda, predios del Hipermaxi Circunvalación	
15	Agencia Siglo XX	Avenida Siglo XX, esquina calle Pablo de Meneses	
Nro.	Tarija	Dirección	
1	Agencia Central + Mi Socio UN	Calle Bolívar # 488 esquina Calle Campero	
2	Yacuiba + Mi Socio UN	Avenida principal Santa Cruz, esquina Calle Cochabamba, plaza principal 12 de Agosto	
Nro.	Sucre	Dirección	
1	Agencia Sucre	Calle Bolivar # 466, zona central	
2	Mercado Campesino	Calle Eulogio Ostria Reyes # 741	
3	Oficina externa Machareti	Avenida Virgen del Carmen, barrio Virgen del Carmen	
Nro.	Oruro	Dirección	
1	Agencia Oruro	Calle Bolivar # 469 entre Calles Potosí y 6 de Octubre, zona Central	
Nro.	Potosi	Dirección	
1	Agencia Potosí	Calle Junin N° 5 Entre Calle Bolívar y Calle Matos	



## BANCO ECONÓMICO S.A. LISTADO DE ACCIONISTAS QUE POSEEN MÁS DEL 10% DE PARTICIPACION

C.I. o NIT	NOMBRE O RAZÓN SOCIAL DEL ACCIONISTA	PORCENTAJE DE PARTICIPACIÓN (%)
1529036 S.C.	EMPRESA DE ENVASES PAPELES Y CARTONES S.A.	36.45%
1497341 S.C.	PERROGON TOLEDO ELVIO LUIS	10.92%
1541007 S.C.	KULJIS FUCHTNER IVO MATEO	10.91%