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 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 the Entity Head Office, a separate questionnaire can be completed for that branch.

4 ENTITY	Question / 2 OM/NEDSHID	Answer
	& OWNERSHIP	
1	Full Legal Name	
		PANCO FOONOMICO O A
		BANCO ECONOMICO S.A.
2	Append a list of foreign branches which are covered by	
_	this questionnaire	
	and quotinians	Banco Economico S.A. has no have foreign branches
3	Full Legal (Registered) Address	
		AVACUATION OF THE TANAGO CANTA OF THE COURT
		AYACUCHO STREET № 166, SANTA CRUZ DE LA SIERRA
4	Full Primary Business Address (if different from above)	
	,	
		1-
	But the purpose and appropriate property and a second	
5	Date of Entity incorporation/establishment	
		19/12/1990
		10/12/1000
6	Select type of ownership and append an ownership chart	
	if available	
6 a	Publicly Traded (25% of shares publicly traded)	No
6 a1	If Y, indicate the exchange traded on and ticker	
	symbol	
	- Cyribor	<u> </u>
		Y
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	0/ -646 - 5-471 1 1 1 1	
1	% of the Entity's total shares composed of bearer shares	
		N/A
		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	
		1
0	Door the Book hours - 354 4.15	
9	Does the Bank have a Virtual Bank License or provide	no
10	services only through online channels?	
10	Name of primary financial regulator/supervisory authority	
		AUTORIDAD DE OLIDEDIADIÓN DEL CIOTEMA EN ACCESA DE
		AUTORIDAD DE SUPERVISIÓN DEL SISTEMA FINANCIERO - ASFI
11	Provide Legal Entity Identifier (LEI) if available	
	and the second s	
		984500E6N10CBF80LE25
10	Descride the fall land	
12	Provide the full legal name of the ultimate parent (if	
	different from the Entity completing the DDQ)	hua.
		N/A
13	Jurisdiction of licensing authority and regulator of ultimate	
	parent	
		ESTADO PLURINACIONAL DE BOLIVIA
		The second secon
14	Select the business areas applicable to the Entity	
14 14 a 14 b	Select the business areas applicable to the Entity Retail Banking Private Banking	Yes

14 c	Commercial Banking	Yes
14 d	Transactional Banking	Yes
14 e	Investment Banking	No ·
14 f	Financial Markets Trading	No Section 1997
14 q	Securities Services/Custody	No No
14 h	Broker/Dealer	No No
14 i	Multilateral Development Bank	No .
14 i	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	
17	Confirm that all responses provided in the above Section	Greater than \$500 million
	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 to the answers in this section.	-
2. PROD	UCTS & SERVICES	
2. PROD 19	DOES the Entity offer the following products and services:	
19	Does the Entity offer the following products and services:	No.
19 19 a	Does the Entity offer the following products and services: Correspondent Banking	No
19	Does the Entity offer the following products and services: Correspondent Banking If Y Does the Entity offer Correspondent Banking	No No
19 a 19 a1	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	
19 a 19 a1 19 a1a	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
19 a 19 a1 19 a1 19 a1a	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
19 a 19 a 19 a 19 a 1 a 1 a 1 b 1 a 1 c	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 No
19 a 19 a 1 19 a 1 a 1 19 a 1 a 1 b 1 19 a 1 c 1 19 a 1 d 1 19 a 1 d 1 19 a 1 d 1 19 a 1 e 1 e 1 e 1 e 1 e 1 e 1 e 1 e 1 e 1	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?	No No No
19 19 a 19 a1 19 a1a 19 a1b 19 a1c 19 a1d 19 a1d 19 a1f	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?	No No No No
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19 a1i	Does the Entity have processes and procedures in	
	place to identify downstream relationships with	No
	MSBs /MVTSs/PSPs?	
19 b	Cross-Border Bulk Cash Delivery	No
19 c	Cross-Border Remittances	Yes
19 d	Domestic Bulk Cash Delivery	
19 e	Hold Mail	No
		No
19 f	International Cash Letter	No
19 g	Low Price Securities	No
19 h	Payable Through Accounts	No
19 i	Payment services to non-bank entities who may then	
	offer third party payment services to their customers?	No.
		140
74.11		
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]	Private Banking	No
19 k	Remote Deposit Capture (RDC)	No.
19	Sponsoring Private ATMs	No
19 m	Stored Value Instruments	No -
19 n	Trade Finance	
19 n	Virtual Assets	Yes
		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
	If you plate the soull state to all the ansience	
19 p3a	If yes, state the applicable level of due diligence	Due Diligence
19 p4	If yes, state the applicable level of due diligence Sale of Monetary Instruments	Due Diligence No
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19 p4 19 p4a 19 p5 19 q 20 20 a 21 3. AML, C ² 22 22 b 22 c 22 d	If yes, state the applicable level of due diligence Sale of Monetary Instruments If yes, state the applicable level of due diligence If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N. clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. TF & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting	Due Diligence No
19 p4 19 p4a 19 p5 19 p5 20 20 a 21 3. AML, C ² 22 a 22 b 22 c 22 d 22 e	If yes, state the applicable level of due diligence Sale of Monetary Instruments If yes, state the applicable level of due diligence if you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. FF & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting CDD	Due Diligence No
19 p4 19 p4a 19 p5 19 p5 20 20 a 21 3. AML, C ² 22 a 22 b 22 c 22 d 22 e 22 f	If yes, state the applicable level of due diligence Sale of Monetary Instruments If yes, state the applicable level of due diligence if you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. TF & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD	Due Diligence No
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19 p4 19 p4a 19 p5 19 q 20 20 a 21 3. AML, C ² 22 a 22 b 22 c 22 d 22 e 22 f 22 g 22 h	If yes, state the applicable level of due diligence Sale of Monetary Instruments If yes, state the applicable level of due diligence if you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. IF & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting CDD Independent Testing Periodic Review	Due Diligence No
19 p4 19 p4a 19 p5 19 q 20 20 a 21 3. AML, C ² 22 22 a 22 b 22 c 22 c 22 c 22 d 22 e 22 f 22 g 22 h 22 i	If yes, state the applicable level of due diligence Sale of Monetary Instruments If yes, state the applicable level of due diligence if you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. If & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing Periodic Review Policies and Procedures	Due Diligence No
19 p4 19 p4a 19 p5 19 q 20 20 a 21 3. AML, C ² 22 a 22 b 22 c 22 d 22 e 22 f 22 g 22 h	If yes, state the applicable level of due diligence Sale of Monetary Instruments If yes, state the applicable level of due diligence if you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. IF & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting CDD Independent Testing Periodic Review	Due Diligence No
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40 d Corruption risks associated with gifts and hospitality, hiring/internships, charitable donations and political Yes	40 c		
40 d Corruption risks associated with gifts and hospitality, hiring/internships, charitable donations and political Yes		that involve state-owned or state-controlled entities or	Yes
hiring/internships, charitable donations and political Yes		public officials	
	40 d	Corruption risks associated with gifts and hospitality,	
controllions			Yes
	-	controutions	L

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	
41	independent third and a series ARC Delicines of	Yes
	independent third party cover ABC Policies and	Yes
42	Procedures?	
	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	
	subject to ABC risk have been outsourced	Not Applicable
42 f	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	
44 u	and the branch/es that this applies to.	
	and the branchies that this applies to.	
45	If appropriate, provide any additional information/context	
	to the answers in this section.	
	to the driswers in this section.	
5. AML. 0	CTF & SANCTIONS POLICIES & PROCEDURES	
46	Has the Entity documented policies and procedures	
40	consistent with continents AMI CTF a Countinents	
	consistent with applicable AML, CTF & Sanctions	
	regulations and requirements to reasonably prevent,	
46 a	detect and report:	
	Money laundering	Yes
46 b	Terrorist financing	Yes
46 c	Sanctions violations	Yes
47	Are the Entity's policies and procedures updated at least	Yes
	annually?	i es
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?	
49	Does the Entity have policies and procedures that:	Yes
49 a	Prohibit the apprint and procedures that:	
43 d	Prohibit the opening and keeping of anonymous and	Yes
40.1	fictitious named accounts	
49 b	Prohibit the opening and keeping of accounts for	Yes
		103
	unlicensed banks and/or NBFIs	
49 c	Prohibit dealing with other entities that provide	Voc
	Prohibit dealing with other entities that provide banking services to unlicensed banks	Yes
49 d	Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit accounts/relationships with shell banks	Yes Yes
	Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit accounts/relationships with shell banks Prohibit dealing with another entity that provides	Yes
49 d 49 e	Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit accounts/relationships with shell banks	
49 d	Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit accounts/relationships with shell banks Prohibit dealing with another entity that provides	Yes Yes
49 d 49 e	Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit accounts/relationships with shell banks Prohibit dealing with another entity that provides services to shell banks Prohibit opening and keeping of accounts for Section	Yes
49 d 49 e 49 f	Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit accounts/relationships with shell banks Prohibit dealing with another entity that provides services to shell banks Prohibit opening and keeping of accounts for Section 311 designated entities	Yes Yes
49 d 49 e	Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit accounts/relationships with shell banks Prohibit dealing with another entity that provides services to shell banks Prohibit opening and keeping of accounts for Section 311 designated entities Prohibit opening and keeping of accounts for any of	Yes Yes Yes
49 d 49 e 49 f	Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit accounts/relationships with shell banks Prohibit dealing with another entity that provides services to shell banks Prohibit opening and keeping of accounts for Section 311 designated entities Prohibit opening and keeping of accounts for any of unlicensed/unregulated remittance agents, exchanges	Yes Yes
49 d 49 e 49 f	Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit accounts/relationships with shell banks Prohibit dealing with another entity that provides services to shell banks Prohibit opening and keeping of accounts for Section 311 designated entities Prohibit opening and keeping of accounts for any of unlicensed/unregulated remittance agents, exchanges houses, casa de cambio, bureaux de change or	Yes Yes Yes
49 d 49 e 49 f 49 g	Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit accounts/relationships with shell banks Prohibit dealing with another entity that provides services to shell banks Prohibit opening and keeping of accounts for Section 311 designated entities 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 Yes Yes
49 d 49 e 49 f	Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit accounts/relationships with shell banks Prohibit dealing with another entity that provides services to shell banks Prohibit opening and keeping of accounts for Section 311 designated entities 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 Assess the risks of relationships with domestic and	Yes Yes Yes Yes
49 d 49 e 49 f 49 g	Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit accounts/relationships with shell banks Prohibit dealing with another entity that provides services to shell banks Prohibit opening and keeping of accounts for Section 311 designated entities 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 Yes Yes

49 i		
	Define the process for escalating financial crime risk issues/potentially suspicious activity identified by employees	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	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 n	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.	_
6. AML, C	OTF & SANCTIONS RISK ASSESSMENT	
6. AML, C	Does the Entity's AML & CTF EWRA cover the inherent	
54 54 a	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client	Yes
54 a 54 b	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product	Yes
54 a 54 b 54 c	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel	Yes Yes
54 a 54 b 54 c 54 d	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography	Yes
54 a 54 b 54 c	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel	Yes Yes
54 a 54 b 54 c 54 d 55	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring	Yes Yes
54 a 54 b 54 c 54 d 55 55 a 55 b	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product 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 Yes
54 a 54 b 54 c 54 d 55 55 a 55 b 55 c	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product 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 a 54 b 54 c 54 d 55 55 a 55 b	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product 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	Yes
54 a 54 b 54 c 54 d 55 c 55 c 55 c 55 c	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product 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
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54 a 54 b 54 c 54 d 55 55 a 55 a 55 c 55 d 55 c 55 d 55 c	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product 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
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54 a 54 a 54 b 54 c 54 d 55 c 55 a 55 c 55 d 55 c 55 f 55 g 55 h 56	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product 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
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54 a 54 a 54 b 54 c 54 d 55 c 55 a 55 b 55 c 55 d 55 c 55 d 55 c 55 d 55 a 55 7 55 a 57 a 57 a 57 a	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product 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
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54 a 54 a 54 a 54 c 54 d 55 c 55 a 55 b 55 c 55 d 55 e 55 f 55 g 55 h 56 56 a	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product 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	Yes
54 a 54 a 54 b 54 c 54 d 55 c 55 a 55 a 55 b 55 c 55 d 55 c 55 d 55 c 56 a 57 c 57 d 58 a 58 a 58 a	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product 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
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58 e	Name Screening	Yes
58 f	Transaction Screening	Yes
58 g	Training and Education	Yes
59	Has the Entity's Sanctions EWRA been completed in the	Yes
	last 12 months?	165
59 a	If N, provide the date when the last Sanctions EWRA	
	was completed.	
		-
	0.5.4.4	
60	Confirm that all responses provided in the above Section	Yes
60 a	are representative of all the LE's branches	
60 a	If N, clarify which questions the difference/s relate to	
	and the branch/es that this applies to.	
61	If appropriate, provide any additional information/context	
	to the answers in this section.	
	is the there in this section.	
7. KYC, C	CDD and EDD	
62	Does the Entity verify the identity of the customer?	Yes
63	Do the Entity's policies and procedures set out when	
	CDD must be completed, e.g. at the time of onboarding	Yes
	or within 30 days?	
64	Which of the following does the Entity gather and retain	
	when conducting CDD? Select all that apply:	
64 a	Customer identification	Yes
64 b	Expected activity	Yes
64 c	Nature of business/employment	
64 d	Ownership structure	Yes
64 e		Yes
	Product usage	Yes
64 f	Purpose and nature of relationship	Yes
64 g	Source of funds	Yes
64 h	Source of wealth	Yes
65	Are each of the following identified:	
65 a	Ultimate beneficial ownership	Yes
65 a1	Are ultimate beneficial owners verified?	Yes
65 b	Authorised signatories (where applicable)	Yes
65 c	Key controllers	Yes
65 d	Other relevant parties	Yes
66	What is the Entity's minimum (lowest) threshold applied to	
	beneficial ownership identification?	20%
67	Does the due diligence process result in customers	
	receiving a risk classification?	Yes
67 a	If Y, what factors/criteria are used to determine the	
	customer's risk classification? Select all that apply:	
67 a1	Product Usage	Yes
67 a2	Geography	Yes
67 a3	Business Type/Industry	Yes
67 a4	Legal Entity type	Yes
67 a5	Adverse Information	Yes
67 a6	Other (specify)	163
	outer (opcomy)	
		Products contracted, Channels used.
		The state of the s
68	For high risk non-individual customers, is a site visit a part	Yes
	of your KYC process?	169
68 a	If Y, is this at:	
68 a1	Onboarding	Yes
68 a2	KYC renewal	Yes
68 a3	Trigger event	Yes
68 a4	Other	No
68 a4a	If yes, please specify "Other"	
	,, p,,,,	
		<u> </u>
69	Does the Entity have a risk based approach to screening	
	customers for Adverse Media/Negative News?	Yes
69 a	If Y, is this at:	
69 a1	Onboarding	Yes
69 a2	KYC renewal	Yes

69 a3 70	Trigger event	Vaa = =
	Trigger event	Yes
	What is the method used by the Entity to screen for	Combination of automated and manual
	Adverse Media/Negative News?	Compiliation of automated and mandal
71	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
	uley are PEPS, or controlled by PEPS?	
71 a	If Y, is this at:	
71 a1	Onboarding	Yes
71 a2	KYC renewal	Yes
71 a3	Trigger event	
1 43		Yes
72	What is the method used by the Entity to screen PEPs?	Combination of automated and manual
		Combination of automated and manual
70	Does the Entity have policies, procedures and processes	
73		
	to review and escalate potential matches from screening	
	customers and connected parties to determine whether	Yes
	they are PEPs, or controlled by PEPs?	
74	Is KYC renewed at defined frequencies based on risk	
	rating (Periodic Reviews)?	Yes
74 -		
74 a	If yes, select all that apply:	
74 a1	Less than one year	No
74 a2	1 – 2 years	Yes
74 a3	3 – 4 years	No
74 a4	5 years or more	No .
74 a5	Trigger-based or perpetual monitoring reviews	Yes
74 a6	Other (Please specify)	
75	Does the Entity maintain and report metrics on current	
	and past periodic or trigger event due diligence reviews?	Yes
76	From the list below, which categories of customers or	
10		
	industries are subject to EDD and/or are restricted, or	
	prohibited by the Entity's FCC programme?	
76 a	Arms, defence, military	Deskibled
		Prohibited
76 b	Respondent Banks	Prohibited
76 b1	if EDD or restricted, does the EDD assessment	
	contain the elements as set out in the Wolfsberg	Yes
	Correspondent Banking Principles 2022?	
70 -		EDD 111 1
76 c	Embassies/Consulates	EDD on risk-based approach
76 d	Extractive industries	Always subject to EDD
76 e	Gambling customers	Prohibited
76 f	General Trading Companies	EDD on risk-based approach
76 g	Marijuana-related Entities	Prohibited
76 h	MSB/MVTS customers	Always subject to EDD
76 i	Non-account customers	Prohibited
76 j	Non-Government Organisations	
		EDD on risk-based approach
76 k	Non-resident customers	Prohibited
76 I	Nuclear power	Prohibited
76 m	Payment Service Providers	Do not have this category of customer or industry
76 n	PEPs	
		EDD on risk-based approach
76 o	PEP Close Associates	EDD on risk-based approach
76 p	PEP Related	EDD on risk-based approach
	Precious metals and stones	
76 q		Always subject to EDD
76 r	Red light businesses/Adult entertainment	Prohibited
	Regulated charities	Do not have this category of customer or industry
	Shell banks	Prohibited
76 s		
76 s 76 t		
76 s 76 t 76 u	Travel and Tour Companies	EDD on risk-based approach
76 s 76 t 76 u 76 v	Unregulated charities	Prohibited
76 s 76 t 76 u 76 v		Prohibited
76 s 76 t 76 u 76 v 76 w	Unregulated charities Used Car Dealers	Prohibited EDD on risk-based approach
76 s 76 t 76 u 76 v 76 w 76 x	Unregulated charities Used Car Dealers Virtual Asset Service Providers	Prohibited
76 s 76 t 76 u 76 v 76 w 76 x	Unregulated charities Used Car Dealers	Prohibited EDD on risk-based approach
76 s 76 t 76 u 76 v 76 w 76 x	Unregulated charities Used Car Dealers Virtual Asset Service Providers	Prohibited EDD on risk-based approach
76 s 76 t 76 u 76 v 76 w 76 x	Unregulated charities Used Car Dealers Virtual Asset Service Providers	Prohibited EDD on risk-based approach
76 s 76 t 76 u 76 v 76 w 76 x	Unregulated charities Used Car Dealers Virtual Asset Service Providers	Prohibited EDD on risk-based approach
76 s 76 t 76 u 76 v 76 w 76 x	Unregulated charities Used Car Dealers Virtual Asset Service Providers	Prohibited EDD on risk-based approach
76 s 76 t 76 u 76 v 76 w 76 x 76 y	Unregulated charities Used Car Dealers Virtual Asset Service Providers Other (specify)	Prohibited EDD on risk-based approach
76 s 76 t 76 u 76 v 76 w 76 x 76 y	Unregulated charities Used Car Dealers Virtual Asset Service Providers	Prohibited EDD on risk-based approach
76 s 76 t 76 u 76 v 76 w 76 x 76 y	Unregulated charities Used Car Dealers Virtual Asset Service Providers Other (specify)	Prohibited EDD on risk-based approach
76 s 76 t 76 u 76 v 76 w 76 x 76 y	Unregulated charities Used Car Dealers Virtual Asset Service Providers Other (specify)	Prohibited EDD on risk-based approach
76 s 76 t 76 u 76 v 76 w 76 x 76 y	Unregulated charities Used Car Dealers Virtual Asset Service Providers Other (specify)	Prohibited EDD on risk-based approach
76 s 76 t 76 u 76 v 76 w 76 x 76 y	Unregulated charities Used Car Dealers Virtual Asset Service Providers Other (specify) If restricted, provide details of the restriction	Prohibited EDD on risk-based approach
76 s 76 t 76 u 76 v 76 w 76 x 76 y	Unregulated charities Used Car Dealers Virtual Asset Service Providers Other (specify) If restricted, provide details of the restriction	Prohibited EDD on risk-based approach Prohibited -
76 s 76 t 76 u 76 v 76 s 76 y 77	Unregulated charities Used Car Dealers Virtual Asset Service Providers Other (specify)	Prohibited EDD on risk-based approach

79 Oos the Entry trave specific procedures for obsaming ontities that handle diefem more you has support accountants, consultants, est estate agents? 80 Oos fee Entry perform an additional control or quality yes accountants, consultants, est estate agents? 81 Confirm that all exponses prouded in the above Section or received and the support of the accountants of the properties of the third special to an or the branches but this applies to the answers in this section. 8. MONITO RING & REPORTING 9. What is the referbol used by the Entity to monitor transactions for suspicious anothers? 9. Monitor of the suspicious processes to the section and analysis of the answer of the vent combination selected, share it distributed by the Entity is combined in a suspicious for suspicious for manufacture or monitorious networks and exclusive anally and exclusive and exclusive and exclusive and exclusive and			
Does the Entity have specific procedures for onbarding onlies that handle defent mens such as lawyers. Section that handle defent mens such as lawyers. Section of the Entity have such as the section of cash'y visit of the section	78 a	If Y indicate who provides the approval:	Senior business management
ontities that hander dirent money such as lawyers, accountarist, consultants, cell estate agents? Ones or earling a perform an additional control or quality of control makes or expressions and affect Lip branches If a Control make a representation of all the Lip branches If a I R, Andry which questions the differences relate to and the branches that this applies to If a spengoriatin, provide any additional information/context to the anovers in this section. If a personnal in the branches that this applies to the anovers in this section to the anovers in this section. If a personnal in the branches that this applies to the anovers in this section to the anovers in this section of the provide any additional information/context to the anovers in this section of the provide any additional information or more than the provided of the anovers in this section of the provided of the anovers in the section and the provided of the anovers in the section and the provided of the anovers in the section of the provided of the anovers in the section	79	Does the Entity have specific procedures for onboarding	
accountants, consultants, real estate agents? 50 Does the Entity serform and estate agents? 51 a and the answers in this section. It is accounted to the answers in this section. 52 If appropriate, provide any additional information/context to the answers in this section. 53 B. MONITORING & REPORTING 50 Does the Entity have real based policies, procedures and monitoring processes for the indirections and monitoring processes for the indirection and the provided in the answers in this section. 54 A Virtual bits method used by the Entity to monitor 55 Automated of transactions are monitored manually of the name of the vendorhoor? 55 Does the Entity have regulatory requirements to report 56 Does the Entity have regulatory requirements to report 57 Does the Entity have policies, procedures and processes to comply virtual space of transactions are monitored manually or the name of the vendorhoor? 56 Does the Entity have regulatory requirements to report 57 Does the Entity have regulatory requirements to report 58 Does the Entity have a data quality management programms to ensure that processes to comply virtual superior and processes to comply virtual superior and processes to complete data for all management programms to ensure that complete data for all management programms to ensure that complete data for all management programms to ensure that complete data for all management programms to ensure that complete data for all management programms to ensure that complete data for all management to ensure that the same policies, procedures and processes to complete data for all management to ensure that the same policies procedures and processes to complete data for all management to ensure that the sam			Yes
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Does the Entity adhere to the Wolfsberg Group Payment	O DAMAS	NT TRANSPARENCY	
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			Tes

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	163
93 01	ii 1, 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 c	If N, explain	·
94	Does the Entity have controls to support the inclusion of required and accurate originator information in cross border payment messages?	Yes
95	Does the Entity have controls to support the inclusion of 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	Yes
96 a	are representative of all the LE's branches 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		
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 foreign financial institutions?	Yes
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' olease 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 sanctions screening processes:	
106 a	Consolidated United Nations Security Council Sanctions List (UN)	Used for screening customers and beneficial owners and for filtering transactional data
106 b	United States Department of the Treasury's Office of Foreign Assets Control (OFAC)	Used for screening customers and beneficial owners and for filtering transactional data
	Office of Financial Sanctions Implementation HMT	

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)	-
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 systems 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 countries/regions against which UN, OFAC, OFSI, EU or 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	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 includes:	
111 a	Identification and reporting of transactions to government authorities	Yes
111 b	Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered	Yes
111 c	Internal policies for controlling money laundering, terrorist financing and sanctions violations	Yes
111 d	New issues that occur in the market, e.g. significant regulatory actions or new regulations	Yes
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 been outsourced	Not Applicable
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 risk products, services and activities?	Yes
114	Does the Entity provide customised training for AML, CTF and Sanctions staff?	Yes
114 114 a	Does the Entity provide customised training for AML, CTF and Sanctions staff? If Y, how frequently is training delivered?	Yes Other

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.
12 OUALE	TY 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.	-
40 8110		
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	Yes
123 b 123 c	Enterprise Wide Risk Assessment Governance	Yes
123 d	KYC/CDD/EDD and underlying methodologies	Yes
123 e	Name Screening & List Management	Yes 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.
14. FRAU	UD .	The state of the s
127	Does the Entity have policies in place addressing fraud risk?	Yes
128	Does the Entity have a dedicated team responsible for preventing & detecting fraud?	Yes

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

BANCO ECONOMICO S.A.

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 aquivalent)

(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 sustainable controls to combat financial crime in order to protect its reputation and to meet its legal and regulatory

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

The Financial Institution further certifies it complies with / is working to con provided in this Wolfsberg CBDDQ will be kept current angwill be update by with the Wolfsberg Correspondent Banking Principles and the Wolfsberg Trade Finance Principles. The information no less frequently than every eighteen months. rking to com

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

SERGIO MAURICIO ASBUN SABA (Global Head of Correspondent 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 honest belief, and that I am authorised to execute this declaration on behalf of the Financial Institution.

RAMIRO BORIS URIBE ALEMAN (MLRO or equivalent), certify that I have read and understood this declaration, that the answers provided in this Wolfsberg belief, and that I air authorised to execute this declaration on behalf of the Financial Institution. CBDDQ are complete and correct to my hanes

February 16, 2024

February 16, 2024

ANCO ECONÓMICO S.A.

RAMIRO BORIS URIBE ALEMAN AMIRU BURIS UNIBE ALEMAN
SUBGERENTE NA CONAL
DE PREVENCIÓN Y CUMPLIMIENTO
BANCO ECONÓNICO S.A.

