

ANTIMONEY LAUNDERING & TERRORIST FINANCING QUESTIONNAIRE

a-	Full Name and Address of Financial Entity BANCO AMAMBAY S.A. Avenida Aviadores del Chaco entre San Martín y Pablo Albornó Asunción, Paraguay.
b-	Date of establishment of the Correspondent Banking Institution 15 de octubre de 1992
c.-	Name of the local supervising authority which issues an operating license to the Correspondent. Banco Central del Paraguay.

I - GENERAL AML & TF POLICIES, PRACTICES AND PROCEDURES (Antimoney Laundering & Terrorist Financing)

1	Does the AML & TF Compliance program require approval of the BANCO AMAMBAY S.A. Board?	YES
2	Does the BANCO AMAMBAY S.A. have a legal and regulatory compliance program that includes a designated Compliance Officer that is responsible for coordinating and overseeing the AML & TF program on a day-to-day basis, which have been approved by senior management of the BANCO AMAMBAY S.A.?	YES
3	Has the BANCO AMAMBAY S.A. developed written policies documenting the processes that they have in place to prevent, detect and report suspicious transactions that have been approved by senior management?	YES
4	In addition to inspections by the government supervisors/regulators, does the BANCO AMAMBAY S.A. have an internal audit function or other independent third party that assesses AML & TF policies and practices on a regular basis?	YES
5	Does the BANCO AMAMBAY S.A. 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 regular financial group)	YES
6	Does the BANCO AMAMBAY S.A. have a policies covering relationships with politically exposed persons consistent with industry best practices?	YES
7	Does the BANCO AMAMBAY S.A. have appropriate record retention procedures pursuant to applicable law?	YES
8	Does the BANCO AMAMBAY S.A. require that its AML & TF policies and practices be applied to all branches and subsidiaries of the BANCO AMAMBAY S.A. both in the home country and in locations outside of the home country?.	YES
9	Are there laws or regulations established to prevent the Laundering of Money or Assets and Terrorist Financing from illegal acts in your country? If so, is the BANCO AMAMBAY S.A. regulated by these laws /regulations?	YES

II - RISK ASESMENT		
10	Does the BANCO AMAMBAY S.A. have a risk focused asesment of its customer base and transactions of its customers?	YES
11	Does the BANCO AMAMBAY S.A. determine the appropriate level of enhanced due diligence necessary for those categories of customers and transactions that the BANCO AMAMBAY S.A. has reason to believe pose a heightened risk of illicit activities at or through the BANCO AMAMBAY S.A.?	YES

III - KNOW YOUR CUSTOMER, DUE DILIGENCE AND ENHANCED DUE DILIGENCE		
12	Has the BANCO AMAMBAY S.A. 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
13	Does the BANCO AMAMBAY S.A. have a requirement to collect information regarding its customer's business activities?	YES
14	Does the BANCO AMAMBAY S.A. collect information and assess its BANCO AMAMBAY S.A. Customer's AML & TF policies or practices?	YES
15	Does the BANCO AMAMBAY S.A. have procedures to establish a record for each customer noting their respective identification documents and Know Your Customer Information collected at account opening?	YES
16	Does the BANCO AMAMBAY S.A. take steps to understand the normal and expected transactions of its customers based on its risk assessment of its customers?	YES

IV - REPORTABLE TRANSACTIONS AND PREVENTION AND DETECTION OF TRANSACTIONS WITH ILLEGALLY OBTAINED FUNDS		
17	Does the BANCO AMAMBAY S.A. have policies or practices for the identification and reporting of transactions that are required to be reported to the authorities?	YES
18	Does the BANCO AMAMBAY S.A. have procedures to identify transactions structured to avoid large cash reporting requirements?	YES
19	Does the BANCO AMAMBAY S.A. screen transactions for customers or transactions the BANCO AMAMBAY S.A. 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
20	Does the BANCO AMAMBAY S.A. 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 regular financial group)	YES
21	Does the BANCO AMAMBAY S.A. have policies to reasonably ensure that it only operates with correspondent banks that posses licenses to operate in their countries of origin?	YES
22	Did the BANCO AMAMBAY S.A. have any case of irregular or suspicious transaction that had to be controlled or reported?	NO

V - TRANSACTION MONITORING		
23	Does the BANCO AMAMBAY S.A. have a monitoring program for suspicious or unusual activity that covers funds transfers and monetary instruments (such as travelers checks, money orders, etc.)?	YES

VI - AML TRAINING		
24	Does the BANCO AMAMBAY S.A. provide AML & TF training to relevant employees that includes identification and reporting of transactions that must be reported to government authorities, examples of different forms of money laundering involving the BANCO AMAMBAY S.A. products and services and internal policies to prevent money laundering?	YES
25	Does the BANCO AMAMBAY S.A. retain record of its training sessions including attendance records and relevant training materials used?	YES
26	Does the BANCO AMAMBAY S.A. have policies to communicate new AML & TF related laws or changes to existing AML & TF related policies or practices to relevant employees.	YES
27	Does the BANCO AMAMBAY S.A. employ agents to carry out some of the functions of the BANCO AMAMBAY S.A. and if so does the BANCO AMAMBAY S.A. provide AML & TF training to relevant agents that includes identifications and reporting of transactions that must be reported to government authorities, examples of different forms of money laundering and terrorist financing involving the BANCO AMAMBAY S.A. products and services and internal policies to prevent money laundering and terrorist financing?	NO

WE DECLARE UNDER OATH, THAT THE INFORMATION GIVEN IN THIS QUESTIONNAIRE IS TRUE AND COMPLETE.

**BANCO AMAMBAY S.A.
AUGUST 2011**