

## CERTIFICATION REGARDING CORRESPONDENT ACCOUNTS FOR FOREIGN BANKS

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*The information contained in this Certification is sought pursuant to Sections 5318(j) and 5318(k) of Title 31 of the United States Code, as added by sections 313 and 319(b) of the USA PATRIOT Act of 2001 (Public Law 107-56).*

This Certification should be completed by any **foreign bank** that maintains a **correspondent account** with any U.S. bank or U.S. broker-dealer in securities (a **covered financial institution** as defined in 31 C.F.R. 103.175(f)). An entity that is not a foreign bank is not required to complete this Certification.

A **foreign bank** is a bank organized under foreign law and located outside of the United States (see definition at 31 C.F.R. 103.11(o)). A **bank** includes offices, branches, and agencies of commercial banks or trust companies, private banks, national banks, thrift institutions, credit unions, and other organizations chartered under banking laws and supervised by banking supervisors of any state (see definition at 31 C.F.R. 103.11(c)).\*

A **Correspondent Account** for a foreign bank is any account to receive deposits from, make payments or other disbursements on behalf of a foreign bank, or handle other financial transactions related to the foreign bank.

*Special instruction for foreign branches of U.S. banks:* A branch or office of a U.S. bank outside the United States is a foreign bank. Such a branch or office is not required to complete this Certification with respect to Correspondent Accounts with U.S. branches and offices of the same U.S. bank.

*Special instruction for covering multiple branches on a single Certification:* A foreign bank may complete one Certification for its branches and offices outside the United States. The Certification must list all of the branches and offices that are covered and must include the information required in Part C for **each** branch or office that maintains a Correspondent Account with a Covered Financial Institution. Use attachment sheets as necessary.

- A. The undersigned financial institution, **BANCO RIPLEY** ("Foreign Bank") hereby certifies as follows:

\*A "foreign bank" does not include any foreign central bank or monetary authority that functions as a central bank, or any international financial institution or regional development bank formed by treaty or international agreement.

B. **Correspondent Accounts Covered by this Certification:** Check one box.

- This Certification applies to **all** accounts established for Foreign Bank by Covered Financial Institutions.
- This Certification applies to Correspondent Accounts established by \_\_\_\_\_ (name of Covered Financial Institution(s)) for Foreign Bank.

C. **Physical Presence/Regulated Affiliated Status:** Check one box and complete the blanks.

- Foreign Bank maintains a **physical presence** in any country. That means:
- Foreign Bank has a place of business at the following street address: HUÉRFANOS 1060, SANTIAGO, CHILE, where Foreign Bank employs one or more individuals on a full-time basis and maintains operating records related to its banking activities.
  - The above address is in CHILE, where Foreign Bank is authorized to conduct banking activities.
  - Foreign Bank is subject to inspection by SUPERINTENDENCIA DE BANCOS E INSTITUCIONES FINANCIERAS (SBIF), the banking authority that licensed Foreign Bank to conduct banking activities.
- Foreign Bank does not have a physical presence in any country, but Foreign Bank is a **regulated affiliate**. That means:
- Foreign Bank is an affiliate of a depository institution, credit union, or a foreign bank that maintains a physical presence at the following street address: \_\_\_\_\_, where it employs one or more persons on a full-time basis and maintains operating records related to its banking activities.
  - The above address is in \_\_\_\_\_ (insert country), where the depository institution, credit union, or foreign bank is authorized to conduct banking activities.
  - Foreign bank is subject to supervision by \_\_\_\_\_ (insert Banking Authority), the same banking authority that regulates the depository institution, credit union, or foreign bank.
- Foreign Bank does **not** have a physical presence in a country and is **not** a regulated affiliate.

D. **Indirect Use of Correspondent Accounts:** Check box to certify.

- No Correspondent Account maintained by a Covered Financial Institution may be used to indirectly provide banking services to certain foreign banks. Foreign Bank hereby certifies that it does not use any Correspondent Account with a Covered Financial Institution to indirectly provide banking services to any foreign bank that does not maintain a physical presence in any country and that is not a regulated affiliate.

E. **Ownership Information:** Check box 1 or 2 below, **if applicable.**

1. **Form FR Y-7 is on file.** Foreign Bank has filed with the Federal Reserve Board a current Form FR Y-7 and has disclosed its ownership information on Item 4 of Form FR Y-7.
2. **Foreign Bank's shares are publicly traded.** Publicly traded means that the shares are traded on an exchange or an organized over-the-counter market that is regulated by a foreign securities authority as defined in section 3(a)(50) of the Securities Exchange Act of 1934 (15 U.S.C. 78c(a)(50)).

If **neither** box 1 or 2 of Part E is checked, complete item 3 below, **if applicable.**

3. Foreign Bank has no **owner(s)** except as set forth below. For purposes of this Certification, **owner** means any person who, directly or indirectly, (a) owns, controls, or has the power to vote 5 percent or more of any class of voting securities or other voting interests of Foreign Bank; or (b) controls in any manner the election of a majority of the directors (or individuals exercising similar functions) of Foreign Bank. For purposes of this Certification, (i) **person** means any individual, bank, corporation, partnership, limited liability company or any other legal entity; (ii) **voting securities or other voting interests** means securities or other interests that entitle the holder to vote for or select directors (or individuals exercising similar functions); and (iii) members of the same family\* shall be considered one **person**.

Name	Address
RIPLEY FINANCIERO LTDA.	HUÉRFANOS 1052 INTERIOR 4° PISO SANTIAGO - CHILE

F. **Process Agent:** Complete the following:

**BANCO RIPLEY DOES NOT CURRENTLY HAVE ANY PROCESS AGENTS**

The following individual or entity: \_\_\_\_\_ is a resident of the United States at the following street address: \_\_\_\_\_, and is authorized to accept service of legal process on behalf of Foreign Bank from the Secretary of the Treasury of the Attorney General of the United States pursuant to Section 5318(k) of title 31, United States Code.

\*The same family means parents, spouses, children, siblings, uncles, aunts, grandparents, grandchildren, first cousins, stepchildren, stepsiblings, parents-in-law and spouses of any of the foregoing. In determining the ownership interests of the same family, any voting interest of any family member shall be taken into account.

**General**


Foreign Bank hereby agrees to notify in writing each Covered Financial Institution at which it maintains any Correspondent Account of any change in facts or circumstances reported in this Certification. Notification shall be given within 30 calendar days of such change.

Foreign Bank understands that each Covered Financial Institution at which it maintains a Correspondent Account may provide a copy of this Certification to the Secretary of the Treasury and the Attorney General of the United States. Foreign Bank further understands that the statements contained in this Certification may be transmitted to one or more Departments or agencies of the United States of America for the purpose of fulfilling such departments' and agencies' governmental functions.

I, CHRISTIAN GONZÁLEZ, certify that I have read and understand this Certification, that the statements made in this Certification are complete and correct, and that I am authorized to execute this Certification on behalf of Foreign Bank.

BANCO RIPLEY

[Name of Foreign Bank]



[Signature]

CHRISTIAN GONZÁLEZ

[Printed Name]

FINANCIAL CONTROL OFFICER

[Title]

Executed on this 13 day of January, 2016.

Received and reviewed by:

Name: \_\_\_\_\_

Title: \_\_\_\_\_

For: \_\_\_\_\_  
[Name of Covered Financial Institution]

Date: \_\_\_\_\_

<b>Financial Institution Name: Banco Ripley</b>
<b>Location: Santiago - Chile</b>

## Anti-Money Laundering Questionnaire

If you answer "no" to any question, additional information can be supplied at the end of the questionnaire.

<b>I. General AML Policies, Practices and Procedures:</b>	Yes	No
1. Is the AML compliance program approved by the FI's board or a senior committee?	Y ✓	N ○
2. Does the FI have a legal and regulatory compliance program that includes a designated officer that is responsible for coordinating and overseeing the AML framework?	Y ✓	N ○
3. Has the FI developed written policies documenting the processes that they have in place to prevent, detect and report suspicious transactions?	Y ✓	N ○
4. In addition to inspections by the government supervisors/regulators, does the FI client have an internal audit function or other independent third party that assesses AML policies and practices on a regular basis?	Y ✓	N ○
5. Does the FI have a policy prohibiting accounts/relationships with shell banks? ( <i>A shell bank is defined as a bank incorporated in a jurisdiction in which it has no physical presence and which is unaffiliated with a regulated financial group.</i> )	Y ✓	N ○
6. Does the FI have policies to reasonably ensure that they will not conduct transactions with or on behalf of shell banks through any of its accounts or products?	Y ✓	N ○
7. Does the FI have policies covering relationships with Politically Exposed Persons (PEP's), their family and close associates?	Y ✓	N ○
8. Does the FI have record retention procedures that comply with applicable law?	Y ✓	N ○
9. Are the FI's AML policies and practices being applied to all branches and subsidiaries of the FI both in the home country and in locations outside of that jurisdiction?	Y ✓	N ○
<b>II. Risk Assessment</b>	Yes	No
10. Does the FI have a risk-based assessment of its customer base and their transactions?	Y ✓	N ○
11. Does the FI determine the appropriate level of enhanced due diligence necessary for those categories of customers and transactions that the FI has reason to believe pose a heightened risk of illicit activities at or through the FI?	Y ✓	N ○
<b>III. Know Your Customer, Due Diligence and Enhanced Due Diligence</b>	Yes	No
12. Has the FI implemented processes for the identification of those customers on whose behalf it maintains or operates accounts or conducts transactions?	Y ✓	N ○

The Wolfsberg Group consists of the following leading international financial institutions: Banco Santander, Bank of Tokyo-Mitsubishi UFJ, Barclays, Citigroup, Credit Suisse, Deutsche Bank, Goldman Sachs, HSBC, JP Morgan Chase, Société Générale and UBS which aim to develop financial services industry standards, and related products, for Know Your Customer, Anti-Money Laundering and Counter Terrorist Financing policies.

# the Wolfsberg Group


13. Does the FI have a requirement to collect information regarding its customers' business activities?	Y ✓	N o
14. Does the FI assess its FI customers' AML policies or practices?	Y ✓	N o
15. Does the FI have a process to review and, where appropriate, update customer information relating to high risk client information?	Y ✓	N o
16. Does the FI have procedures to establish a record for each new customer noting their respective identification documents and 'Know Your Customer' information?	Y ✓	N o
17. Does the FI complete a risk-based assessment to understand the normal and expected transactions of its customers?	Y ✓	N o
<b>IV. Reportable Transactions and Prevention and Detection of Transactions with Illegally Obtained Funds</b>	<b>Yes</b>	<b>No</b>
18. Does the FI have policies or practices for the identification and reporting of transactions that are required to be reported to the authorities?	Y ✓	N o
19. Where cash transaction reporting is mandatory, does the FI have procedures to identify transactions structured to avoid such obligations?	Y ✓	N o
20. Does the FI screen customers and transactions against lists of persons, entities or countries issued by government/competent authorities?	Y ✓	N o
21. Does the FI have policies to reasonably ensure that it only operates with correspondent banks that possess licenses to operate in their countries of origin?	Y ✓	N o
<b>V. Transaction Monitoring</b>	<b>Yes</b>	<b>No</b>
22. Does the FI have a monitoring program for unusual and potentially suspicious activity that covers funds transfers and monetary instruments such as travelers checks, money orders, etc?	Y ✓	N o
<b>VI. AML Training</b>	<b>Yes</b>	<b>No</b>
23. Does the FI provide AML training to relevant employees that includes: <ul style="list-style-type: none"> <li>▪ Identification and reporting of transactions that must be reported to government authorities.</li> <li>▪ Examples of different forms of money laundering involving the FI's products and services.</li> <li>▪ Internal policies to prevent money laundering.</li> </ul>	Y ✓	N o
24. Does the FI retain records of its training sessions including attendance records and relevant training materials used?	Y ✓	N o
25. Does the FI communicate new AML related laws or changes to existing AML related policies or practices to relevant employees?	Y ✓	N o
26. Does the FI employ third parties to carry out some of the functions of the FI?	Y ✓	N o
27. If the answer to question 26 is yes, does the FI provide AML training to relevant third parties that includes: <ul style="list-style-type: none"> <li>▪ Identification and reporting of transactions that must be reported to government authorities.</li> <li>▪ Examples of different forms of money laundering involving the FI's products and services.</li> <li>▪ Internal policies to prevent money laundering.</li> </ul>	Y ✓	N o

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Space for additional information:  
*(Please indicate which question the information is referring to.)*

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For questions 5 and 6 it is worth mentioning that, as a policy, we do not operate nor perform transactions abroad. Therefore, we have no relations whatsoever with shell banks. On a related matter, regarding question 21 we do not deal with correspondent banks.  
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<b>Name: Sonia Ricke Siegmund</b>
<b>Title: Compliance Officer</b>
<b>Signature:</b> 
<b>Date: April, 2017</b>