

THE FOLLOWING DOCUMENT IS FOR REFERENCE PURPOSES ONLY AND CONSTITUTES THE MINIMUM REQUIREMENTS A COMPLIANCE AFFIDAVIT SHOULD INCLUDE. IT IS ENCOURAGED TO INCLUDE FURTHER DETAILS RELATED TO THE COMPLIANCE OF THE REQUIREMENTS SHOWN HERE.

**COMPLIANCE AFFIDAVIT
For International Banking Entities and International Financial Entities**

I _____ [COMPLETE NAME AND LAST NAME], _____ [POSITION],
on behalf of _____ [INSTITUTION'S NAME] (hereinafter, the "Entity")
certify, under penalty of perjury, that:

A. Compliance Statement on Bank Secrecy Act (BSA/AML) and OFAC

1. The Entity has designed, implemented, and maintains an adequate BSA/AML compliance program that complies with BSA regulatory requirements and is commensurate with the Entity's ML/TF and other illicit financial activity risk profile.
2. The BSA/AML compliance program provides for the following requirements:
 - A system of internal controls to assure ongoing compliance.
 - Independent testing for compliance to be conducted by bank personnel or by an outside party.
 - Designation of an individual or individuals responsible for coordinating and monitoring day-to-day compliance (BSA compliance officer).
 - Training for appropriate personnel.
 - Ongoing customer due diligence (CDD).
3. The Entity has established and maintain adequate policies and effective procedures, reasonably designed to assure and monitor compliance with BSA regulatory requirements (BSA/AML compliance program).
4. The Entity has implemented information technology sources, AML/TF Monitoring Systems, and appropriate risk-based procedures for conducting ongoing Customer Due Diligence (CDD), Enhanced Due Diligence (EDD), and complying with beneficial ownership requirements for legal entity customers as set forth in regulations issued by Financial Crimes Enforcement Network (FinCEN) that support BSA/AML compliance.
5. The Entity has implemented and monitors a comprehensive risk-based Office of Foreign Assets Control (OFAC) compliance program that considers the Entity's OFAC risk, its products, services, customers, entities, transactions, and geographic locations.
6. The procedures and steps taken by the management of the Entity related to the implementation of the BSA/AML/OFAC compliance programs, as applicable to the financial activities conducted by the Entity, are adequate.

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B. Compliance Statement with Capital Requirements

The Entity certifies, under perjury that at all times it has been a well-capitalized institution, in accordance to the FDIC Prompt Corrective Action (PCA) guidelines, as may be applicable to the financial activities conducted by the Entity, or that the Entity is in compliance with those capital levels provided by Regulation from the Commissioner (as defined by Act No. 52 as amended, Act No. 273, as amended, regulations, circular letters or guidelines applicable to the Entity (including, but no limited to, rulings issued to the Entity).

The signature of the Entity's CEO or, if it is a Unit, the signature of the highest-ranking officer in Puerto Rico.