



AML/CTF/KYC QUESTIONNAIRE

The AML/CTF/KYC questionnaire of BDO Unibank, Inc. provides an overview of the Bank and its subsidiaries' Anti-Money Laundering, Counter Terrorist Financing and Know Your Client policies and practices compliant with relevant Laws, Bangko Sentral ng Pilipinas (BSP) and Anti-Money Laundering Council (AMLC) guidelines, as well as its due diligence requirements associated with the provision of correspondent banking services in conducting international business.

INSTITUTIONAL INFORMATION

Name of Institution	BDO Unibank, Inc.
Country of Incorporation	Philippines
Registered Office	BDO Corporate Center, 7899 Makati Avenue Makati City, 0726 Philippines
Corporate Legal Form	BDO is a publicly listed stock corporation
SWIFT Code	BNORPHMM
Corporate Website	www.bdo.com.ph
Name of Registration Body	Securities and Exchange Commission (SEC) and Bangko Sentral ng Pilipinas
Registration/License No.	SEC Registered (Registry No. 34001) / Banking license granted by the BSP on 05 August 1996 to operate as an Expanded Commercial Bank
Date of Incorporation	20 December 1967
GIIN Number	URS0GI.00000.LE.608
Supervising Regulatory Body	Bangko Sentral ng Pilipinas and Anti-Money Laundering Council
External Auditor	Punongbayan & Araullo, a member firm within Grant Thornton International Ltd.
Principal Activities	BDO is a full-service universal bank in the Philippines. It provides a complete array of industry-leading products and services including Lending (corporate and consumer), Deposit-taking, Foreign Exchange, Brokering, Trust and Investments, Credit Cards, Corporate Cash Management and Remittances in the Philippines. Through its local subsidiaries, the Bank offers Leasing and Financing,

Investment Banking, Private Banking, Rural Banking, Bancassurance, Insurance Brokerage and Stock Brokerage services.

Please refer also to the BDO website

https://www.bdo.com.ph/about-bdo/business-operation#corporate_profile

List of Domestic/Foreign Branches, Subsidiaries and Affiliates

Please refer to the BDO website

Branches:

<https://www.bdo.com.ph/branches-atms-locator>

Subsidiaries:

<https://www.bdo.com.ph/subsidiaries>

OWNERSHIP AND MANAGEMENT INFORMATION

Stock Exchange Listing

Philippine Stock Exchange (PSE), under the trading name of BDO Unibank, Inc. and BDO as the stock code

Ownership Structure

BDO is a member of the SM Group, one of the country's largest and most successful conglomerates with businesses spanning between retail, mall operations, property development (residential, commercial, resorts/hotel), and financial services.

Please refer also to the BDO website

<https://www.bdo.com.ph/about-bdo/shareholdings-structure>

<https://www.bdo.com.ph/corporate-governance/ownership>

Management Structure

BDO's day-to-day operations are handled by a team of professional managers and bank officers. The Bank has one of the industry's strongest Board of Directors composed of professionals with extensive experience in various fields that include banking, accounting, finance, law, bank regulations and risk management, strategy formulation and merchandise marketing.

Please refer also to the BDO website

List of Directors:

<https://www.bdo.com.ph/about-bdo/board-management-organizational-structure>

Principal Officers:

<https://www.bdo.com.ph/corporate-governance/ownership>

then click Annual Stockholder Meeting (DIS)

A) General AML Policies, Practices And Procedures:		Yes	No
1	Is the AML compliance program approved by the board or a senior committee?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
1.1	Does the board or senior management receive AML/CTF management information?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
1.2	How often does the board or senior management receive the AML/CTF management information? Monthly or more often as needed.		
1.3	<p>Please describe the escalation/reporting process.</p> <p>The Anti-Money Laundering Unit of BDO Compliance reports on AML Compliance and oversight monthly to the Board Audit Committee and noted by the Board of Directors. AML issues are escalated to the AML Committee, a management committee whose principal function is to provide an oversight to the Bank and its subsidiaries for the proper and efficient implementation of the Anti-Money Laundering Laws and Program. The AML Committee which is composed of members from Compliance, Corporate Governance, Legal, Branch Banking and an HO Senior Officer meets once every quarter or as often as may be required.</p>		
2	Does BDO have a legal and regulatory compliance program that includes a designated officer that is responsible for coordinating and overseeing the AML framework?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
2.1	Does BDO have a formal/independent anti-money laundering compliance function?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
2.2	<p>Please describe the governance and structure of the AML/CTF compliance function.</p> <p>The AML Unit of the Bank is under the Compliance Office and reports to the Chief Compliance Officer who reports directly to the Board of Directors thru the Board Audit Committee. The AML Unit is responsible for overseeing, coordinating and managing the proper and efficient implementation of the Bank's Anti-Money Laundering and Terrorist Financing Prevention Program following a risk based approach, which includes the implementation of the KYC policies and procedures, record retention policies, system of timely capturing and reporting of covered transactions, investigation of suspicious alerts and reporting if warranted, development and conduct of customized AML training programs and the conduct of independent AML compliance checking program.</p> <p><i>The AML Unit is divided into three sections:</i></p> <p>1) <i>Transaction Monitoring Section</i> - responsible for managing the implementation of the daily operation of the SAS-AML Electronic Monitoring System including the reporting of covered transactions and evaluation of suspicious transactions for reporting to the Anti-Money Laundering Council.</p> <p>2) <i>Policy Development and Training Section</i> - responsible for the updating of the Bank's AML policies and procedures in compliance with AML Act, conduct of independent AML compliance checking, development of AML training courses, research on global trends on AML compliance and the project management of the AML automated monitoring system.</p> <p>3) <i>Critical Case Analytics Section</i> - responsible for the analysis and evaluation of high profile cases where clients are allegedly involved in any of the money laundering predicate crimes, process the filing or non-filing of Suspicious Transaction Reports and the development and implementation of analytics tools in the conduct of AML due diligence on selected accounts and survey of accounts by industries.</p> <p>The AML Unit has oversight over dedicated Compliance Units in specific business functions such as Trust, Remittance, Global Operations and Unit Compliance Coordinators in various Head Office units and branches. It also provides oversight on AML compliance to domestic and foreign subsidiaries thru their respective Compliance Officers.</p>		

3	<p>Has BDO developed written policies documenting the processes that they have in place to prevent, detect and report suspicious transactions?</p> <p>The AML Policies of BDO are found in the Money Laundering and Terrorist Financing Prevention Program Manual, which is being updated yearly, and approved by the Board Audit Committee and the Board of Directors.</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
4	<p>Does BDO have documented policies outlining the processes regarding escalation of financial crime risk issues including, where appropriate, customer exits?</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
5	<p>Does BDO have an internal audit function or other independent third party, other than government supervisors/regulators, that assesses AML/CTF policies and practices on a regular basis?</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
5.1	<p>Is it a separate function within the bank or an independent third party?</p> <p>Separate function within the bank.</p>		
5.2	<p>What is the frequency of the review? Annually</p>		
5.3	<p>Are there any pertinent audit findings relating to AML? This is confidential information.</p>		
6	<p>Does BDO have a policy regarding the length of time client records need to be retained for?</p> <p>KYC records are retained and stored as long as the account exists. Transaction records are stored for 5 years from the transaction date and 5 years from the time the account was closed.</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
7	<p>Are BDO'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?</p> <p>Our policy applies to all local and foreign branches and subsidiaries of BDO. Our foreign branches and subsidiaries abroad also comply with the AML laws, rules and regulations of their respective host countries/jurisdictions.</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
8	<p>Is money laundering and terrorist financing considered a crime in your country?</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
9	<p>Has your country established laws designed to prevent money laundering and terrorist financing?</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
9.1	<p>If 'Yes' to Question 9, please indicate the official name of the law which regulates AML procedure in your country and the date on which this law and subsequent amendments, if any, were passed/gazetted.</p> <p><i>BDO follows the AML and CTF Laws in the Philippines:</i></p> <ol style="list-style-type: none"> Republic Act (R.A.) No. 9160: The Anti-Money Laundering Act of 2001 with the following amendments: <ol style="list-style-type: none"> R.A. No 9194: An Act Amending Republic Act No. 9160 (effective 2003) R.A. 10167: An Act to Further Strengthen the Anti-Money Laundering Law (effective on 06 July 2012) R.A. 10365: An Act Further Strengthening the Anti-Money Laundering Law (effective on 19 April 2013) R.A. No. 10927 - An Act Designating Casinos as Covered Persons (effective 03 August 2017) R.A. 10168: The Terrorism Financing Prevention and Suppression Act of 2012 (effective on 05 July 2012) 		

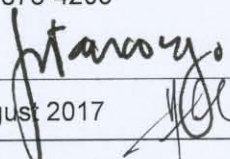

	3. BSP Circular No. 706: Updated Anti-Money Laundering Rules and Regulations (effective on 05 January 2011) 4. R.A. 9372: Human Security Act of 2007 (effective 2007) 5. 2016 Revised Implementing Rules and Regulations of Republic Act No. 9160, As Amended (effective 2016) 6. BSP Circular No. 950: Amendments to Part Eight of the Anti-Money Laundering Regulations of the Manual of Regulations for Banks and Manual of Regulations for Non-Bank Financial Institutions (effective 05 April 2017)		
9.2	Is BDO subject to such laws designed to prevent money laundering and terrorist financing?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
10	Has BDO been cited by your regulatory agency for any violation of AML laws, rules or regulations in the past 5 years? This is confidential information.		
11	Does BDO have a formal exit process to deal with those customers it deems to represent unacceptable money laundering/terrorist financing/sanctions/bribery and corruption risk? After the conduct of enhanced due diligence, BDO terminates the banking relationship of existing client or shall not proceed with the opening of the account if the customer is in the Caution list and has an adverse information (e.g. reference to the OFAC-SDN and United Nations Security List in the Negative List Database System (NLDS) and other information known by the approving officer, as applicable).	<input checked="" type="checkbox"/>	<input type="checkbox"/>
B) Risk Assessment		Yes	No
12	Does BDO have a risk assessment methodology to assess the AML/financial crime risk posed by its customers and their transactions?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
12.1	What factors/criteria are used to determine the customer's risk classification? Country, products, business activity/industry, client's profile, delivery channels, ownership structure and affiliation.		
12.2	Are there any categories of customers that are prohibited? The Bank has no dealings with shell companies and virtual exchange companies. Same policy applies for OFAC sanctioned countries unless, after conduct of enhanced due diligence it is determined that the client even if national of a sanctioned country is not among those listed as those where no dealings should be entered into. Nevertheless, such nationals will be considered as high risk and are subject to annual enhanced due diligence.	<input checked="" type="checkbox"/>	<input type="checkbox"/>
12.3	Are there any particular industries/geographies identified as high risk by your AML Programme? The Bank's policy defines a list of high risk clients / industries, and identifies geographical areas (foreign and domestic) classified as high risk based on sanction list.	<input checked="" type="checkbox"/>	<input type="checkbox"/>
13	Does the bank perform an Enterprise Wide Risk Assessment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
13.1	Please provide details of the frequency. Annually		

C)	Know Your Customer, Due Diligence and Enhanced Due Diligence	Yes	No
14	Does BDO conduct KYC due diligence for all clients at on-boarding?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
14.1	<p>Please describe the minimum documentation standard.</p> <p><i>The Bank follows the AMLA Revised Implementing Rules and Regulations of R.A. 9160 as amended, which states that Minimum Information/Documents Required for Individual Customers are as follows:</i></p> <ul style="list-style-type: none"> a) Name; b) Present address; c) Permanent address; d) Date and place of birth; e) Nationality; f) Nature of work and name of employer or nature of self-employment/business; g) Contact numbers; h) Tax identification number, social security system number or government service insurance system number; i) Specimen signature; j) Source of funds; and k) Names of beneficiaries in case of insurance contracts and whenever applicable. <p><i>Minimum Information/Documents Required for Corporate and Juridical Entities:</i></p> <ul style="list-style-type: none"> (a) Certificates of Registration issued by the Department of Trade and Industry for single proprietors, or by the Securities and Exchange Commission for corporations and partnerships, and by the BSP and AMLC for money changers/foreign exchange dealers and remittance agents; (b) Articles of Incorporation/Partnership; (c) Latest General Information Sheet which lists the names of directors/trustees/partners, principal stockholders owning at least twenty percent (20%) of the outstanding capital stock and primary officers such as the President and Treasurer; (d) Beneficial owners and beneficiaries of the corporate and/or juridical entities; (e) Board or Partners' resolution duly certified by the Corporate/Partners' Secretary authorizing the signatory to sign on behalf of the entity; and (f) For entities registered outside of the Philippines, similar documents and/or information shall be obtained duly authenticated by the Philippine Consulate where said entities are registered. 		
15	Does BDO identify the Ultimate Beneficial Owners (UBOs) of its customers?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
15.1	<p>Please indicate the details i.e. if ownership structure is fully identified or thresholds are used, is the threshold risk dependent, are there any specific thresholds for certain customer types?</p> <p>Prior to on-boarding, beneficial owner/s, principal officers and stockholders owning at least 20% of the company are checked against the Office of the Foreign Assets Control-Specially Designated Nationals (OFAC-SDN) Watch list, United Nations Security Council (UNSC) Sanctioned List and the generic PEP list via the Negative List Database System.</p> <p>BDO classifies each of its clients in terms of the overall risk they pose, with the corresponding Customer Due Diligence. Average Due Diligence is done for Normal Risk and Enhanced Due Diligence is done for High Risk clients.</p>		
16	Does BDO have a requirement to collect information regarding its customers' business activities?	<input checked="" type="checkbox"/>	<input type="checkbox"/>

17	Does BDO review source of funds when conducting due diligence on new customers?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
18	Does BDO review source of wealth when conducting due diligence on new customers?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
19	Who is responsible for KYC during on-boarding and renewal? Branch of account or Head Office account officer handling the account.		
20	Is the KYC process centralized (as opposed to the branches conducting their own KYC)? BDO has the 'one-touch' KYC policy which means that the customer whether transacting with branches or a BDO unit or subsidiary of the Bank, is dealing with "BDO." Hence, if an existing client, the KYC already done at the first instance of banking relationship shall suffice.	<input type="checkbox"/>	<input checked="" type="checkbox"/>
20.1	If No, is there a centralised review or quality assurance function?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
20.2	Who signs off or approves clients KYC? Does this process differ for clients with different risk ratings? KYC is performed by the branch or account officer before the start of the relationship. Clients classified as high risk require higher management approval for the acceptance of the opening of the account.		
21	Is KYC information reviewed and updated on a periodic basis? The information of existing customers are updated every three (3) years for normal risk clients and every two (2) years for high risk clients with active accounts.	<input checked="" type="checkbox"/>	<input type="checkbox"/>
22	Does a mechanism exist for a KYC renewal to be triggered off-cycle?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
22.1	If Yes, please describe the events that may typically trigger a KYC renewal: (a) Manually triggered due diligence (Negative ML news, observations on unusual transactions by branch or business unit of account, etc.); (b) Suspicious alerts on customers' transactions from the AML automated system; and (c) Inquiry/information coming from the AMLC.		
23	Is the sign-off or approval process different for KYC renewals to on-boarding?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
24	Does BDO have a risk-based assessment of its customer base and their transactions?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
25	Describe your EDD process in terms of what it consists of and who it applies to: EDD is required for High Risk Customers by evaluating the client's profile and securing higher approvals. Business Units/Branches conducts an annual enhanced due diligence of high risk clients, the products availed of, channels used (e.g., electronic banking, etc.) and geographical location where the clients operate/reside. An AML/KYC questionnaire for these high risk accounts is accomplished annually and the client record is likewise tagged as high risk in the bank's system. The KYC data of existing high risk customers shall be updated every two (2) years.		

D) Sanctions Compliance		Yes	No
26	<p>Which economic sanctions laws, regulations and programs does your Institution seek to comply with?</p> <p>BDO complies with the directives of the Office of Foreign Assets Control, Financial Action Task Force (FATF), and United Nations Security Council sanctions laws and the list issued by the Bangko Sentral ng Pilipinas. Moreover, BDO has foreign subscription to Lexis Nexis, a watchlist service provider, being used by our foreign subsidiaries and the Hong Kong branch.</p>		
27	<p>Has BDO implemented controls which identify payments that may be prohibited under sanctions laws?</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
E) Reportable Transactions and Prevention and Detection of Transactions with Illegally Obtained Funds		Yes	No
28	<p>Does BDO have policies or practices for the identification and reporting of transactions that are required to be reported to the authorities?</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
29	<p>Is BDO mandated to report transactions above a certain thresholds?</p> <p>AML regulation requires reporting of transactions in excess of 500,000 PHP or the equivalent foreign currency amount to the Regulator.</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
30	<p>If 'Yes' to Question 29, does BDO have procedures to identify transactions structured to avoid such obligations?</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
31	<p>Does BDO have a monitoring program for unusual and potentially suspicious activity that covers funds transfers and monetary instruments such as travelers checks, money orders, etc?</p> <p>The SAS AML system generates alerts on possible money laundering transactions. Alerts are reviewed and investigated by the concerned business unit/branch of account and by a dedicated team in the AMLU for possible suspicious transaction reporting.</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
32	<p>Does BDO ensure the confidentiality of Suspicious Transaction Report (STR) filings or any information that would reveal the existence of a STR?</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
F) Correspondent Banking Relationship		Yes	No
33	<p>Does BDO have policies to reasonably ensure that it only operates with correspondent banks that possess licenses to operate in their countries of origin?</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
34	<p>Does BDO allow direct use of the correspondent account by third parties to transact business on their behalf? (Payable-through accounts)</p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
35	<p>Does BDO have a standard AML/KYC questionnaire that is provided to correspondent banks?</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
36	<p>Does BDO's AML Policy restrict it from providing services to certain classes of MSB? (e.g. by type or country of operation?)</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
36.1	<p>What are these restrictions?</p> <p>BDO deals only with BSP and AMLC registered or regulated Money Services Business (money changers, foreign exchange dealers and remittance agents).</p>		

37	Does BDO's AML Policies and procedures require enhanced due diligence of its MSB customers?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
G) AML Training		Yes	No
38	<p>Does BDO provide AML training to relevant employees that includes:</p> <ul style="list-style-type: none"> ▪ Identification and reporting of transactions that must be reported to government authorities. ▪ Examples of different forms of money laundering involving the FI's products and services. ▪ Internal policies to prevent money laundering. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>
39	Does BDO retain records of its training sessions including attendance records and relevant training materials used?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
40	<p>Does BDO communicate new AML related laws or changes to existing AML related policies or practices to relevant employees?</p> <p>Customized AML trainings on significant policies, new laws and regulations are conducted face to face to frontliners and relationship managers. E-Learning courses are given online with exams after completion of the training and are taken every 2 years by all bank personnel.</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
41	Does BDO employ third parties to carry out some of the functions of the FI?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
42	<p>If the answer to question 41 is yes, does BDO provide AML training to relevant third parties that includes:</p> <ul style="list-style-type: none"> ▪ Identification and reporting of transactions that must be reported to government authorities. ▪ Examples of different forms of money laundering involving the FI's products and services. ▪ Internal policies to prevent money laundering. <p>The Bank outsources some of its functions except those that are inherently bank functions (e.g. Deposit related operation). The Bank however does not provide AML training to these relevant agents. If these service providers are covered institutions as defined under the Anti-Money Laundering Act, as amended, they are mandated to conduct their own AML Training.</p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
H) Products and Services		Yes	No
43	Does BDO provide any services to non-account customers (e.g. cashing of cheques or travellers cheques for walk-in customers)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
43.1	What services are provided? Bills or utilities payment and remittance cash pick-up.		
43.2	In which currency (or currencies) are such services provided? PHP and USD		
43.3	Are there transaction limits for non-account customers transactions?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
43.4	Are transactions for non-account customers subject to the same level of AML monitoring/screening as account customers' transactions?	<input checked="" type="checkbox"/>	<input type="checkbox"/>

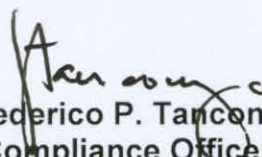
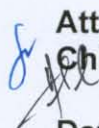
44	Has BDO adopted the Wolfsberg Group principles on Payment Transparency, including the requirements to not omit, delete or alter information in a payment order for the purpose of avoiding detection of information by any other bank in the payment process?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
45	Does BDO offer banknotes services to its bank customers?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
46	Does BDO conduct internet banking?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
46.1	Is internet banking the sole channel offered by BDO?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
47	Please confirm that third party (customer) commercial payments will only be transmitted through MT202 COV or serial MT103	<input checked="" type="checkbox"/>	<input type="checkbox"/>
I) Contact Details		Yes	No
48	Has BDO appointed a Compliance Officer for the AML/KYC program?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
49	<p>If yes, please give the name and title of Compliance Officer responsible for the AML / KYC program and his / her contact details for future references.</p> <p>Name: Atty. Federico P. Tancongco</p> <p>Title: Chief Compliance Officer and Senior Vice President</p> <p>E-mail: tancongco.federico@bdo.com.ph</p> <p>Address: 14th Floor, BDO North Tower, BDO Corporate Center 7899 Makati Avenue, Makati City, 0726 Philippines</p> <p>Phone No: +63 2 878-4202</p> <p>Fax No: +63 2 878-4205</p> <p>Signature: </p> <p>Date:  22 August 2017</p>		



CERTIFICATION

I, ATTY. FEDERICO P. TANCONGCO, Chief Compliance Officer and Senior Vice President of BDO Unibank, Inc., do hereby certify the following:

- That the answers and statements made in our AML / KYC Questionnaire are complete, accurate to the best of our knowledge and reflective of our Anti-Money Laundering & Know Your Client policies, procedures and program.
- That all Officers and Staff of our bank are aware of these policies, procedures and program and there is an adequate compliance oversight process in place.
- That we also require our correspondent banks and tie-ups with which we do business maintain procedures for such purpose.
- That I am the duly authorized officer of BDO Unibank, Inc. to complete and execute the AML KYC Questionnaire


Atty. Federico P. Tancongco
Chief Compliance Officer and Senior Vice President

Date: 22 August 2017