the Wolfsberg Group

Financial Institution Name: Location (Country):

Prima AFP	
Peru	

No#	Question	Answer
1. ENTIT	TY & OWNERSHIP	
1	Full Legal name	Prima AFP SA
2	Append a list of foreign branches which are	I NA
ľ	covered by this questionnaire	
	, '	
	Full Local (Degistered) Address	Avenida Juan de Arona N° 830 (piso 11), Distrito de San isidro , Lima-Perú
3	Full Legal (Registered) Address	Avenida Juan de Arona N 630 (piso 11), Distrito de San Isidro , Lima- Perd
4	Full Primary Business Address (if different from	
	above)	
5	Date of Entity incorporation/establishment	04/03/2005
6	Select type of ownership and append an ownership	
	chart if available	
6.0	Dublish Too ded (OFO) of the control blob too ded	
6 a	Publicly Traded (25% of shares publicly traded)	No PRIMAC1
6 a1	If Y, indicate the exchange traded on and ticker	PRIMACT
	symbol	
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	Shareholders -Grupo Credito SA (99.99%)
	beneficial owners with a holding of 10% or more	-Grapo Gredito GA (99.3976)
		Ultimate beneficial owner : Romero Famlily (13.06%)
7	% of the Entity's total shares composed of bearer	NA
	shares	
8	Does the Entity, or any of its branches, operate under	No Vo
	an Offshore Banking License (OBL) ?	
8 a	If Y, provide the name of the relevant branch/es	
	which operate under an OBL	
9	Does the Bank have a Virtual Bank License or	
	provide services only through online channels?	No 💌
10	Provide Legal Entity Identifier (LEI) if available	
	, , ,	
2. AML,	CTF & SANCTIONS PROGRAMME	
11	Does the Entity have a programme that sets	
	minimum AML, CTF and Sanctions standards	
	regarding the following components:	
<u></u>	Apprinted Office 191 (5)	
11 a	Appointed Officer with sufficient	Yes
<u> </u>	experience/expertise	
11 b	Adverse Information Screening	Yes
11 c	Beneficial Ownership	Yes
11 d	Cash Reporting	Yes
11 e	CDD	Yes
11 f	EDD	Yes

10 Rospundent reamy Yes	14 -	Loden and at Tastin a	T _V	_
11 Pelaties and Procedures Yes	11 g	Independent Testing	Yes	
11 PEP Screening				
11 II Searcions Yes Yes Yes Yes Yes Yes Yes Yes Yes Ye				
11				
11 m Suspicious Abrilly Reporting Yes Tin Trainsaction Montecomp Yes Tin Trainsaction Montecomp Yes Tin Trainsaction Montecomp Yes Yes Tin Trainsaction Montecomp Yes Yes Yes Tin Trainsaction Montecomp Yes				
11 n			Yes	I
10 Transaction Monitoring 2 Is the Entity's MAL CTF & Sanctions policy approved at least annually by the Board or equivalent Senior Management Committee? 3 Does the Entity use third parties to carry out any components of its AML, CTF & Sanctions policy and the provider of the AML, CTF & Sanctions policy and the provider of the AML, CTF & Sanctions policy and the provider of the AML, CTF & Sanctions policy and the provider of the AML, CTF & Sanctions policy and the provider of the AML, CTF & Sanctions policy and the provider of the AML, CTF & Sanctions policy and the provider of the AML, CTF & Sanctions policy and the AML of the AM	11 m	Suspicious Activity Reporting	Yes	
is the Entity's AML_CITE & Sanctions policy approved at least annually by the Board or equivalent Senior Management Committee? 13 Obes the Entity use third parties to carry out any components of its AML_CITE & Sanctions programme? 13 a If Y, provide further details 14 Does the entity have a whistleblower policy? Yes 15 In the Entity documented policies and procedures consistent with applicate ARC regulations and requirements to reasonably prevent, debetch and report trivitery and compiter? 16 Does the Entity storumented policies and procedures consistent with applicate ARC regulations and requirements to reasonably prevent, debetch and report trivitery and compiter? 16 Does the Entity storumented audit function or other independent third party cover ARC Policies and Procedures? 17 Does the Entity triviter and audit function or other independent third party cover ARC Policies and Procedures? 18 In the of Defence Yes 19 To 1st Line of Defence Yes 19 To 3 Total Line of Defence Yes 19 To 4 Total parties to which specific compliance activities subject to ARC risk have been outsourced (contractorisconsultants) 4. AML_CITE & SANCTIONS POLICIES & PROCEDURES 18 Line of Defence Yes 19 Description of the Policies and procedures consistent with applicable AML_CITE & Sanctions regulations and requirements to reasonably prevent, detect and report 19 Description of the process of procedures that: 19 a Money Bundering 19 C Prohibit the opening and keeping of accounts for unificational banks and exercise to although the other entities that provide surfaces to although the other entities that pro	11 n	Training and Education	Yes	
at least annually by the Board or equivalent Senior Management Committee? 13 Dees the Entity use third parties to carry out any propriets and the senior of	11 o	Transaction Monitoring	Yes	
components of its AML, CTF & Sanctions programme? 13 a	12	at least annually by the Board or equivalent Senior	Yes	4
14 Does the entity have a whistleblower policy? 3. ANTI BRIBERY & CORRUPTION 15 Has the Entity documented policies and procedures consistent with applicable ABC regulations and requirements to reasonably prevent, detect and report procedures? 16 Does the Entity routed mandatory ABC Policies and Procedures Procedures? 17 Does the Entity provide mandatory ABC training to: 18 and Line of Defence 18 To Line of Defence 19 To List Line of Defence 19 To Line of Defence 19 To List Line of Defence 19 List Line	13	components of its AML, CTF & Sanctions	No	
3. ANTI BRIBERY & CORRUPTION 15	13 a	If Y, provide further details		
Has the Entity documented policies and procedures consistent with applicable ABC regulations and requirements to reasonably prevent, detect and report bribery and corruption? 16 Does the Entity internal audit function or other independent third party cover ABC Policies and Procedures? 17 Does the Entity provide mandatory ABC training to: 17 a Board and Senior Committee Management Yes 17 b Ist Line of Defence Yes 17 c 2nd Line of Defence Yes 17 d 3rd Line of Defence Yes 17 d 3rd Line of Defence Yes 17 d Third parties to which specific compliance activities subject to ABC risk have been outsourced Not applicable 17 f Non-employed workers as appropriate (contractors/consultants) 18 Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report. 18 a Money laundering Yes 19 Does the Entity have policies and procedures that: 19 a Prohibit the opening and keeping of accounts for unicensed banks and/or NBEF is and fictitious named accounts 19 b Prohibit dealing with other entities that provide banks and/or NBEF is provided banks Yes 19 d Prohibit dealing with other entities that provide services to shell banks 19 d Prohibit dealing with other entities that provide services to shell banks 19 d Prohibit dealing with other entities that provide services to shell banks 19 d Prohibit dealing with other entities that provide services to shell banks or the provide services to shell banks or the provide services to shell banks 19 d Prohibit dealing with other entities that provides section 31 dealing and keeping of accounts for such and or many of unificensed university and provide services to shell banks or the p	14	Does the entity have a whistleblower policy?	Yes	
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17 a	16	independent third party cover ABC Policies and	Yes	•
17 a Board and Senior Committee Management Yes	17	Does the Entity provide mandatory ABC training to:		
17 b	17 a		Yes	
17 d 3rd Line of Defence Yes Third parties to which specific compliance activities subject to ABC risk have been outsourced Not applicable Versible to ABC risk have been outsourced Not applicable Versible to Contractors/consultants) 4. AML, CTF & SANCTIONS POLICIES & PROCEDURES 18 Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: 18 a Money laundering Yes Sanctions regulations and requirements to reasonably prevent, detect and report: 18 a Money laundering Yes Sanctions Yes Sanctions and Procedures that: 19 a Prohibit the opening and keeping of anonymous and fictitious named accounts 19 b Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs Yes Sanctions Yes Yes Sanctions Yes Sanctions Yes Yes Sanctions Yes Yes Yes Sanctions Yes Sanctions Yes Yes Sanctions Yes Sanction Sancting Yes Yes Sanction Sancting Yes Yes Sanction Sancting Yes Yes Sanction Sancting Yes Sancting Yes Sancting Yes Yes Sancting Yes Sancting Yes Yes Sancting Yes Yes Sancting Yes	17 b	-	Yes	\blacksquare
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A. AML, CTF & SANCTIONS POLICIES & PROCEDURES 18		l · · · · · · · · · · · · · · · · · · ·	Not applicable	
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consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: 18 a Money laundering Yes		F & SANCTIONS POLICIES & PROCEDURES		
18 b Terrorist financing Yes 18 c Sanctions violations Yes 19 Does the Entity have policies and procedures that: 19 a Prohibit the opening and keeping of anonymous and fictitious named accounts 19 b Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs 19 c Prohibit dealing with other entities that provide banking services to unlicensed banks 19 d Prohibit dealing with another Entity that provides services to shell banks 19 e Prohibit dealing with another Entity that provides services to shell banks 19 f Prohibit opening and keeping of accounts for Section 311 designated entities 19 g 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 19 h Assess the risks of relationships with domestic and foreign PEPs, including their family and close associates 19 i Define the process for escalating financial crime risk issues/potentially suspicious activity identified by employees	18	consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent,		
18 c Sanctions violations Yes 19 Does the Entity have policies and procedures that: 19 a Prohibit the opening and keeping of anonymous and fictitious named accounts 19 b Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs 19 c Prohibit dealing with other entities that provide banking services to unlicensed banks 19 d Prohibit accounts/relationships with shell banks 19 e Prohibit dealing with another Entity that provides services to shell banks 19 f Prohibit opening and keeping of accounts for Section 311 designated entities 19 g 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 19 h Assess the risks of relationships with domestic and foreign PEPs, including their family and close associates 19 i Define the process for escalating financial crime risk issues/potentially suspicious activity identified by employees	18 a	Money laundering	Yes	1
19 Does the Entity have policies and procedures that: 19 a Prohibit the opening and keeping of anonymous and fictitious named accounts 19 b Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs 19 c Prohibit dealing with other entities that provide banking services to unlicensed banks 19 d Prohibit accounts/relationships with shell banks 19 e Prohibit dealing with another Entity that provides services to shell banks 19 f Prohibit opening and keeping of accounts for Section 311 designated entities 19 g 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 19 h Assess the risks of relationships with domestic and foreign PEPs, including their family and close associates 19 i Define the process for escalating financial crime risk issues/potentially suspicious activity identified by employees	18 b	Terrorist financing	Yes	
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19 b Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs 19 c Prohibit dealing with other entities that provide banking services to unlicensed banks 19 d Prohibit accounts/relationships with shell banks 19 e Prohibit dealing with another Entity that provides services to shell banks 19 f Prohibit opening and keeping of accounts for Section 311 designated entities 19 g 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 19 h Assess the risks of relationships with domestic and foreign PEPs, including their family and close associates 19 i Define the process for escalating financial crime risk issues/potentially suspicious activity identified by employees	19 a	, , , ,	Yes	$\overline{\blacksquare}$
19 c Prohibit dealing with other entities that provide banking services to unlicensed banks 19 d Prohibit accounts/relationships with shell banks 19 e Prohibit dealing with another Entity that provides services to shell banks 19 f Prohibit opening and keeping of accounts for Section 311 designated entities 19 g 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 19 h Assess the risks of relationships with domestic and foreign PEPs, including their family and close associates 19 i Define the process for escalating financial crime risk issues/potentially suspicious activity identified by employees	19 b	Prohibit the opening and keeping of accounts for	Yes	
19 d Prohibit accounts/relationships with shell banks 19 e Prohibit dealing with another Entity that provides services to shell banks 19 f Prohibit opening and keeping of accounts for Section 311 designated entities 19 g 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 19 h Assess the risks of relationships with domestic and foreign PEPs, including their family and close associates 19 i Define the process for escalating financial crime risk issues/potentially suspicious activity identified by employees	19 с	Prohibit dealing with other entities that provide	Yes	—
Prohibit dealing with another Entity that provides services to shell banks 19 f	19 d	<u> </u>	Voc	
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foreign PEPs, including their family and close associates 19 i Define the process for escalating financial crime risk issues/potentially suspicious activity identified by employees Yes Yes	19 g	of unlicensed/unregulated remittance agents, exchanges houses, casa de cambio, bureaux de	Yes	•
risk issues/potentially suspicious activity identified by employees		foreign PEPs, including their family and close	Yes	•
19 j Outline the processes regarding screening for		risk issues/potentially suspicious activity identified	Yes	•
sanctions, PEPs and Adverse Media/Negative Yes News	19 j		Yes	—

20	Has the Entity defined a risk tolerance statement or similar document which defines a risk boundary around their business?	Yes	•
21	Does the Entity have record retention procedures that comply with applicable laws?	Yes	\blacksquare
21 a	If Y, what is the retention period?	5 years or more	•
5. KYC, 0	CDD and EDD		
22	Does the Entity verify the identity of the customer?	Yes	
23	Do the Entity's policies and procedures set out when		
	CDD must be completed, e.g. at the time of onboarding or within 30 days?	Yes	•
24	Which of the following does the Entity gather and retain when conducting CDD? Select all that apply:		
24 a	Customer identification	Yes	
24 b	Expected activity	Yes	
24 c	Nature of business/employment	Yes	
24 d	Ownership structure	Yes	
24 e			
24 e 24 f	Product usage	Yes	
	Purpose and nature of relationship	Yes	
24 g	Source of funds	Yes	
24 h	Source of wealth	Yes	
25	Are each of the following identified:		
25 a	Ultimate beneficial ownership	Yes	
25 a1	Are ultimate beneficial owners verified?	Yes	
25 b	Authorised signatories (where applicable)	Yes	
25 c	Key controllers	Yes	
25 d	Other relevant parties	No	
26	Does the due diligence process result in customers receiving a risk classification?	Yes	\
27	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	•
28	Does the Entity have policies, procedures and processes to review and escalate potential matches from screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?	Yes	•
29	Is KYC renewed at defined frequencies based on risk rating (Periodic Reviews)?	Yes	\blacksquare
29 a	If yes, select all that apply:		
29 a1	Less than one year	Yes	
29 a2	1 – 2 years	Yes	
29 a3	3 – 4 years	No	
29 a4	5 years or more	No	
29 a5	Trigger-based or perpetual monitoring reviews	Yes	
29 a6	Other (please specify)		
30	From the list below, which categories of customers or industries are subject to EDD and/or are restricted, or prohibited by the Entity's FCC programme?		
30 a	Arms, Defence, Military	Prohibited	
30 b	Respondent Banks	EDD on risk-based approach	
30 b1	If EDD or EDD & restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022?	Yes	•
30 с	Embassies/Consulates	Do not have this category of customer or industry	
30 d	Extractive industries	Do not have this category of customer or industry	T
30 e	Gambling customers	Prohibited	
30 f			
	General Trading Companies	Do not have this category of customer or industry	_
30 g	Marijuana-related Entities	Prohibited	
30 h	MSB/MVTS customers	Prohibited	
30 i	Non-account customers	Do not have this category of customer or industry	
30 j	Non-Government Organisations	Do not have this category of customer or industry	▼
30 k			
JU N	Non-resident customers	EDD on risk-based approach	\blacksquare

30 I	I M. I	In the same	
30 m	Nuclear power	Prohibited I	
	Payment Service Providers	Do not have this category of customer or industry	_
30 n	PEPs	EDD on risk-based approach	
30 o	PEP Close Associates	EDD on risk-based approach	V
30 p	PEP Related	EDD on risk-based approach	
30 q	Precious metals and stones	EDD on risk-based approach	
30 r	Red light businesses/Adult entertainment	Prohibited	
30 s	Regulated charities	Do not have this category of customer or industry	
30 t	Shell banks	Prohibited	
30 u	Travel and Tour Companies	Do not have this category of customer or industry	
30 v	Unregulated charities	Prohibited	\blacksquare
30 w	Used Car Dealers	Do not have this category of customer or industry	
30 x	Virtual Asset Service Providers	Prohibited	
30 y	Other (specify)		
31	If restricted, provide details of the restriction		
6. MONIT	ORING & REPORTING		
32	Does the Entity have risk based policies, procedures		
	and monitoring processes for the identification and reporting of suspicious activity?	Yes	
33	What is the method used by the Entity to monitor transactions for suspicious activities?	Combination of automated and manual	•
33 a	If manual or combination selected, specify what type of transactions are monitored manually	Sample review by the compliance team	
34	Does the Entity have regulat ory requirements to report suspicious transactions?	Yes	lacksquare
34 a	If Y, does the Entity have policies, procedures and processes to comply with suspicious transactions reporting requirements?	Yes	•
35	Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity?	Yes	•
7. PAYMI	ENT TRANSPARENCY		
36	Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards?	Yes	v
37	Does the Entity have policies, procedures and processes to comply with and have controls in place to ensure compliance with:		
37 a	FATF Recommendation 16	Yes	
37 b	Local Regulations	Yes	
37 b1	If Y, Specify the regulation	-Resolution SBS N° 2660-2015 issued on May 14th, 2015- -Resolution SBS N° 4705-2017 issued on December 6th, 2017 (which modifies Resolution SBS N°2660-2015)	
37 c	If N, explain		
8. SANC	TIONS		
38	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	•
39	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	•

40	Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists?	Yes	•
41	Select the Sanctions Lists used by the Entity in its sanctions screening processes:		
41 a	Consolidated United Nations Security Council Sanctions List (UN)	Used for screening customers and beneficial owners and for filtering tran	•
41 b	United States Department of the Treasury's Office of Foreign Assets Control (OFAC)	Used for screening customers and beneficial owners and for filtering tran	•
41 c	Office of Financial Sanctions Implementation HMT (OFSI)	Used for screening customers and beneficial owners and for filtering tran	•
41 d	European Union Consolidated List (EU)	Used for screening customers and beneficial owners and for filtering tran	V
41 e	Lists maintained by other G7 member countries	Not used	V
41 f	Other (specify)	Section 311, FATF	
42	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?	No	•
9. TRAININ	IG & EDUCATION		
43	Does the Entity provide mandatory training, which includes:		
43 a	Identification and reporting of transactions to government authorities	Yes	•
43 b	Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered	Yes	•
43 с	Internal policies for controlling money laundering, terrorist financing and sanctions violations	Yes	•
43 d	New issues that occur in the market, e.g. significant regulatory actions or new regulations	Yes	•
44	Is the above mandatory training provided to :		
44 a	Board and Senior Committee Management	Yes	
44 b	1st Line of Defence		•
44 c 44 d	2nd Line of Defence		¥
	3rd Line of Defence		•
44 e	Third parties to which specific FCC activities have been outsourced	<u> </u>	•
44 f	Non-employed workers (contractors/consultants)	Not Applicable	•
10. AUDIT			
45	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	•
Signature Pa	<u>ge</u>		
Wolfsberg Gro	oup Financial Crime Compliance Questionnaire 2023 (FCCQ	V1.2)	
PRIMA AFP S	S.A.	(Financial Institution name)	
ANDREA M	IAS AMOROS (Senior Com	pliance Manager- Second Line representative), certify that I have read and	i
understood th declaration, th	is at the answers provided in this Wolfsberg FCCQ are complet	e and correct to my honest belief.	
03/18/2025	Firmado Digitalmente por: ANDREA ALEJANDRA MAS AMOROS Fecha: 18/03/2025 11:55:50 (Signature &	Date)	