

Financial Information Unit

Resolution UIF N° 228/2007

REGULATION OF SECTION 21, SUBSECTIONS (A) AND (B) OF LAW NUMBER 25246. SUSPICIOUS TRANSACTION, MODALITIES, TIMING AND LIMITS ON COMPLIANCE WITH THEIR REPORT.

Buenos Aires, December 5, 2007

CONSIDERING provisions of Law Number 25246, amended by Law Numbers 26087, 26119 and 26268, and regulations of Decree Number 290/07 and FIU Regulation Number 2/2002 (amended by Resolution UIF N° 2/2007) and,

WHEREAS, section 20 of Law Number 25246 sets forth the persons legally bound to report to the FINANCIAL INFORMATION UNIT under section 21 thereof.

WHEREAS, aforementioned section 21 in its subsection (a) sets forth the obligations persons under section 20 are bound to and that aforementioned FINANCIAL INFORMATION UNIT shall also set the term and conditions to file information collected.

WHEREAS, section 21 subsection (b) last paragraph stipulates that the FINANCIAL INFORMATION UNIT shall issue guidelines about the modalities, timing and limits on compliance with the obligation to report suspicious transaction for each category of legally bound reporting party and type of activity.

WHEREAS, section 20 subsection (1), sets forth as legally bound parties to report to "Financial entities under provisions of Law 21526, as amended;...". Subsection (2) "Entities under provisions of Law 18924, as amended, and natural or artificial persons authorized by the Central Bank to operate in the purchase and sale of currency in the form of cash money or cheques drawn in foreign currency, or by

means of credit or debit cards or in transfers of funds within the national territory and abroad.”

WHEREAS Law Number 26268 — published on the Official Gazette on July 5, 2007— introduces, among others, the following amendments:

Through Section III it added — in Chapter VI, Title VIII, Book Two of the Criminal Code—, Section 213 quarter which reads: "The penalty of confinement or imprisonment of FIVE (5) to FIFTEEN (15) years, unless a more severe punishment were appropriate pursuant to provisions under sections 45 and 48, shall be impose upon anyone who collects or provides property or money, in the knowledge that they are to be used, in full or in part, to finance a terrorist criminal association as described under section 213 ter or a member of such association in order to commit any of the crimes for which they have been set up, regardless of whether such crimes are committed or not.”

Section 6 of Law Number 25246 is replaced by Section 4 of the aforementioned Law setting forth — in its new writing — that: The “Financial Information Unit shall be responsible for analyzing, handling, and disclosing information with the purpose of preventing and deterring: 1. Laundering of proceeds (section 278, subsection 1 of the Criminal Code), arising from the commission of the following crimes: a) Crimes related to drug trafficking and trade (Law 23737); b) Crimes related to gunrunning (Law 22415); c) Crimes related to the activities of an aggravated criminal association pursuant to section 210 bis of the Criminal Code or of a terrorist criminal association pursuant to section 213 ter of the Criminal Code; d) Illegal acts committed by criminal associations (section 210 of the Criminal Code) organized to commit crimes for political or racial purpose; e) Crimes of fraud against the Public Administration (Section 174 subsection (5) of the Criminal Code); f) Crimes against the Public Administration as set forth by Chapters VI,VII, IX and IX bis, title XI, Book Two of the Criminal Code; g) Crimes related to the prostitution of minors and child pornography as set forth by section 125, 125 bis,

127 bis and 128 of the Criminal Code; h) Crimes related to terrorist financing (section 213 quarter of the Criminal Code). 2. The financing of terrorism (Section 213 quarter of the Criminal Code).” Section 13, subsection 2 of Law Number 25246 is replaced by section 5 of Law Number 26268, reading as follows:

”Section XIII – The Financial Information Unit Shall: (...) 2. Perform and direct the analysis of acts, activities and transactions that according to the provisions of this Law may constitute laundering of proceeds of crime or terrorist financing as stipulated by section 6 hereof and, if pertinent, shall make the evidential material gathered available to the Attorney General’s Office so as to bring the appropriate actions.”

WHEREAS, therefore it is appropriate to modify Resolution 2/2002, modified by Resolution 2/2007, concerning Financial and Exchange Industry, published in the Official Gazette on October 29, 2002 and June 15, 2007 respectively, for the purpose of adapting the modification inserted in Law Number 25246 by Law Number 26268; as well as add Appendix I, Section II, GUIDELINES, point 2.1.6.6 regarding Funds Wire Transfers.

WHEREAS, a Technical Commission between the Financial Information Unit and the Central Bank of the Argentine Republic to serve this modification was constituted.

WHEREAS, in consequence it was considered necessary to modify Appendixes I and II of Resolution 2/2002 (amended by Resolution 2/2007), adding terrorist financing for the purpose of adapting them to the provisions of Law Number 26268; as well as adding Appendix I, section II, GUIDELINES, point 2.1.6.6 regarding Funds Wire Transfers.

WHEREAS, for the purposes of modifying the Guidelines for the Financial and Foreign Exchange Industry, this FINANCIAL INFORMATION UNIT has based on

following precedents: The new 40 (Forty) Recommendations from the FINANCIAL ACTION TASK FORCE (FATF/GAFI) — approved in 2003 —; the 9 (Nine) Special Recommendations from FATF on Terrorist Financing; the Essential Criteria ALA/CFT stipulated in the evaluation methodology of countries in 2004, the Rule of the Central Bank of the Argentine Republic, as well as other international precedents in the field of money laundering.

WHEREAS, in exercise of powers conferred by section 20 of Decree Number 290/07, the FINANCIAL INFORMATION UNIT is empowered to establish procedures and timing, legally bound parties, included in section 20 of Law Number 25246, shall be bound to in order to comply with the duty to report under section 21 subsection (b) of aforementioned Law.

WHEREAS, in exercise of the power conferred by section 14 subsections (7) and (10), and section 21 subsections (a) and (b) of Law Number 25246, the FINANCIAL INFORMATION UNIT is empowered to issue directions and guidelines binding reporting persons to comply with and implement.

WHEREAS, the Legal Department of this Unit has expressed its appropriate legal opinion.

WHEREAS, this Regulation is issued in exercise of powers conferred by Law Number 25246 and amendments, after consulting with the Advisory Council of this Unit.

Therefore,

THE PRESIDENT OF THIS FINANCIAL INFORMATION UNIT RESOLVES:

Section I – To pass the "REGULATION OF SECTION 21, SUBSECTION (A) AND (B) OF LAW NUMBER 25246. SUSPICIOUS TRANSACTIONS. MODALITIES,

OPPORTUNITIES AND LIMITS ON COMPLY WITH THEIR REPORT. FINANCIAL AND FOREIGN EXCHANGE INDUSTRY.” Incorporated as Appendix I to this Resolution.

Resolution replacing Appendix I of Resolution Number 2/2002 of the FINANCIAL INFORMATION UNIT (Text according to Resolution 2/2007).

Section II — To pass the "GUIDE TO UNSUAL OR SUSPICIOUS TRANSACTIONS WITHIN THE FINANCIAL AND FOREIGN EXCHANGE INDUSTRY”, incorporated as Appendix II to this Resolution, replacing Appendix II of Resolution 2/2002 of the FINANCIAL INFORMATION UNIT (amended also by Resolution 2/2007).

Section III – To pass the “SUSPICIOUS TRANSACTION REPORT”, which is incorporated to Resolution 2/2002 of the FINANCIAL INFORMATION UNIT as Appendix III, keeps its validity.

Section IV — To enter this Resolution into force as from its publication in the Official Gazette.

Section V — Be it recorded, communicated, published and passed onto the National Bureau Official Record, and timely filed. — Rosa C. Falduto.

APPENDIX I

REGULATION OF SECTION 21, SUBSECTIONS (A) AND (B) OF LAW NUMBER 25246. SUSPICIOUS TRANSACTIONS. MODALITIES, TIMING AND LIMITS ON COMPLIANCE WITH THEIR REPORT – FINANCIAL AND FOREIGN EXCHANGE INDUSTRY.

I. GENERAL

In order to combat and deter the laundering of proceeds of crimes criminalized under section 278 of the Criminal Code and the financing of terrorism, criminalized under section 213 quáter of the Criminal Code and pursuant to section 14, subsections (7) and (10) and section 21 subsections (a) and (b) of Law Number 25246 as amended, any natural and/or artificial person authorized to operate under Laws Number 21526, as amended, and Number 18924 shall comply with provisions laid down by this Regulation, notwithstanding rules duly issued by the Central Bank of the Argentine Republic in relation to this matter.

II. GUIDELINES

1. Customer Identification:

1.1. Concept of Customer: the Financial Information Unit shall understand as “Customer” the definition adopted and suggested by the Inter-American Drug Abuse Control Commission of the Organization of American States (CICAD-OAS).

Therefore, Customer is every natural or legal person with whom a legally bound reporting party occasionally or regularly establishes a business relationship, whether financial, economic, or commercial. Thus, a customer is any natural or legal person, who once, occasionally or regularly conducts transactions with a legally bound reporting party. Examples: customer is an account holder; an investor, anyone who purchases/sells foreign currency, whether in currency or hard currency; purchases/sells negotiable instruments, establishes a trust; conducts leasing transactions, takes out an insurance of any kind, etc.

Hence, persons bound to report suspicious transactions shall establish a business relationship with at least two types of customers:

1.1.1 Regular Customers: persons who maintain a business relationship with the financial institution on a regular basis.

1.1.2 Occasional Customers: persons who once or occasionally carry out transactions with legally bound reporting parties. This takes place when customers do not hold call deposit accounts with the financial institution, except when the customer is included in a database and/or a file where identification information required for habitual customers are recorded.

The fundamental principle for this Regulation is the worldwide known “know your customer” rule.

2. Information Requirements

2.1. General Requirements – Regular and Occasional Customers.

Pursuant to subsection (a) of section 21 of Law 25246, reporting parties under sections (1) and (2) of Section 20 thereof, shall request from their customers proof of identity, incorporation, and address, notwithstanding the amount of the transactions carried out by such customers.

2.1.1 Regular Customers — Individuals: full names and surnames, date and place of birth; nationality; sex; marital status; number and type of identity document whose original must be presented. (Following documents shall be accepted as valid proof of identity: the documents indicated in the consolidated text of the Rules on identity documents currently in force from the Central Bank of the Argentine Republic (B.C.R.A.); C.U.I.L. (Employee Identification Number), C.U.I.T. (Taxpayer Identification Number) or C.D.I. (Identification Code); address (street, number, city, province and postcode); phone number; profession, trade, industry, business, etc. that constitutes a customer’s main business activity.

Same procedure shall be followed for attorneys-in-fact, guardians, curators, or agents.

Sworn Affidavit on legality and origin of funds and, where necessary to ascertain a customer's profile, relevant supporting documentation to ascertain a customer's economic and financial condition.

2.1.2 Regular Customers — Artificial Persons: corporate name, date and company registration number; tax registration number; date of articles of incorporation; updated copy of by-laws, irrespective of presentation of the original; address (street, number, city, province and postcode); phone number of headquarters, main business activity. Additionally, identifying information on senior officers, legal representatives, attorneys-in-fact and/or individuals with authorized signature, who carry out transactions on the artificial person's behalf, which is customer of the financial institution.

Where associations, foundations, and other incorporated or unincorporated organizations, same information shall be collected.

Copy of the last balance sheet certified by a certified public accountant and the relevant Association of Certified Public Accountants or alternative information in order to ascertain the economic and financial condition of the customer.

2.1.3. Occasional Customers – Individuals: Transactions not exceeding the amount of ARS (argentine pesos) 30,000: full names and surnames, number and type of identity document whose original must be presented (documents indicated in the consolidated text of the Rules on identity documents currently in force from the Central Bank of the Argentine Republic shall be accepted as valid proof of identity); address (street, number, city, province and postcode); phone number; main business activity (only when transactions be equal to or over ARS (Argentine pesos) 1,000 or equivalent amount in other currencies).

2.1.4. Occasional Customers – Artificial Persons: Transactions not exceeding the amount of ARS (argentine pesos) 30,000: corporate name, tax registration number; address (street, number, city, province and postcode); phone number; main business activity (only when the amount of the transactions be equal to or over ARS (Argentine pesos) 1,000 or equivalent amount in other currencies).

Additionally, identifying information —under item 2.1, section 2.1.3— on the individuals conducting transactions on the artificial person's behalf shall be requested. The relevant authorizing documents shall also be presented.

2.1.5. Further Requirements: Occasional Customers: Individuals and Artificial Persons: In addition to general requirements, following further requirements shall be complied with:

Where transactions exceed the amount of ARS (argentine pesos) 30,000, a sworn affidavit on legality and origin of funds shall be requested.

Where transactions exceed the amount of ARS (argentine pesos) 200,000, in addition to the sworn affidavit on legality and origin of funds, relevant supporting documentation and/or information proving the stated origin of funds shall also be requested.

Where single or several foreign exchange transactions carried out in a month exceed the amount of ARS (Argentine pesos) 30,000 and the customer's payment is in cash, a sworn affidavit on legality and source of funds, along with relevant supporting documentation and/or information proving the stated source of funds shall be requested.

Where a financial institution detects linked transactions that individually do not reach the minimum designated threshold, but in the aggregate they reach or exceed such threshold, requirements under this section shall apply.

2.1.6. Enhanced Due Diligence on Customer Identification

2.1.6.1 A Customer is presumably acting on other's behalf: if there are doubts as to whether customers are acting on their own behalf or there is certainty that they are not, reporting parties shall implement additional reasonable measures in order to obtain information on the true identity of the person on behalf of whom customers are acting (beneficial owner and/or final customer).

2.1.6.2. Shell/Vehicle Companies. Reporting parties should prevent natural persons from using artificial persons as shell companies to carry out their transactions. Financial institutions shall implement measures to understand the company structure, to ascertain the source of its funds, and to identify the owners, beneficiaries, and the persons who really control the artificial person.

2.1.6.3. Trusts: Identification shall include trustees, trustors and beneficiaries.

2.1.6.4. Non-face-to-face transactions: notwithstanding the general requirements under this item, reporting parties shall adopt specific and appropriate measures to compensate for the greater risk of laundering of proceeds of crime and terrorism financing when business relationships are established or transactions are carried out with customers who were not physically present to be identified.

2.1.6.5. Government officials: As regards their personal accounts, enhanced due diligence on customer identification shall be applied to the government officials fulfilling the functions or holding the positions under Section 5 of Law 25188.

2.1.6.6. Wire transfers: Financial institutions shall adopt all necessary measures to gather accurate and complete information on the originator of the wire transfer.

In all abovementioned cases, financial institutions shall perform enhanced due diligence on transactions carried out by said customers, taking into account if the transactions are reasonable and have a lawful and economic purpose.

2.1.7. Reduced or Simplified Measures to identify customers:

2.1.7.1. Funds from another financial institution: Where funds from another domestic financial institution, it is assumed that said institution have complied with the “know your customer” rule.

Where funds from a foreign financial institution, except funds from the non-cooperative countries and territories designated by FATF, it is assumed that said institution have complied with the “know your customer” rule.

Notwithstanding, where funds are transferred from countries classified as low or zero-tax jurisdictions pursuant to Decree 1037/00 as amended, the domestic correspondent financial institution shall request a explicit statement on compliance with the “know your customer” rule from the foreign financial institution.

These presumptions do not save the financial institution from analyzing the possible incoherence between the profile of the customer receiving the funds and the amount and/or type of transaction from the other financial institution.

2.1.7.2 Special cases: General requirements for customers’ identification shall be met as follows in the cases mentioned below:

- Natural or legal persons who are investors of mutual funds: only when the financial institution acts as placement agent.
- Holders of debt instruments and/or certificates of participation in financial trusts –with public offering- when purchased through the financial institution – whichever the nature of its participation- and the natural or artificial persons are acting as trustors.

2.1.7.3. Reduced controls: Where customers carry out transactions which do not exceed the amount of ARS (Argentine pesos) 30,000 per month and the accounts are related to:

- Salary payments;
- Unemployment benefit payments for employees from the construction industry;
- Social security payments.

Information provided by employers and competent municipal, provincial or national authorities shall be sufficient.

This presumption does not save the financial institution from analyzing the possible incoherence between the profile of the customer, holder of the account, and the amounts and/or modalities of the transaction.

2.1.7.4. Exceptions: Following customers shall be exempted from the general requirements for customer identification:

- Officials from the non-financial public sector or their agents only when they carry out transactions in compliance with their specific functions;
- Artificial persons from the financial sector or their agents, only when they carry out transactions in compliance with their specific functions;
- Accounts credited with deposits from court cases.

III. RECORD KEEPING

Reporting parties should keep records on following information, so as to be used as evidence in any investigation into money laundering and financing of terrorism:

a. As regards customer identification, documents proving compliance with the "know your customer" rule and any additional information the reporting party may have regarded as necessary to request, for at least five (5) years after the business

relationship is ended, notwithstanding the requirements set by the Central Bank of the Argentine Republic (B.C.R.A.).

b. As regards transactions, original documents or their copies certified by the financial institution, for at least five (5) years as from transactions were conducted, notwithstanding the requirements set by the Central Bank of the Argentine Republic (B.C.R.A.).

IV. REQUIREMENTS WHEN REPORTING SUSPICIOUS TRANSACTIONS:

Requirements shall mainly base upon:

- a) Custom and practice of the financial and foreign exchange industry.
- b) Expertise and capability of reporting parties.
- c) Effective implementation of the “know your customer” rule.

Additionally and for the purposes of full compliance with this rule, the financial institution shall pay special attention to the true identity of customers and ascertain that customers are not included in terrorist and/or terrorist organizations lists from the United Nations Security Council Resolutions or that the transaction is not a contractual or business relationship with any of them. Reporting parties may click on the link available at the FIU website to this end (www.uif.gov.ar)

The financial institution’s knowledge about its customers and the sector will enable it to be properly protected from laundering of proceeds of crime and financing of terrorism.

Aforementioned stipulations shall be deemed as essential tools for timely detection of suspicious transactions.

1) Procedure for Detecting Suspicious Transactions.

Considering the particular features of services offered, each financial institution shall develop and implement control programmes aimed at knowing adequately all of its customers, in accord with the risk assessment policy implemented.

Knowing your customer shall begin by entering customer's data into the computing system and complying with the requirements set by the financial institution for every service offered, through which a link may be established. The financial institution must ascertain veracity of most relevant personal and commercial data by following the methods said institution deems most effective.

1.1. When starting the relationship whether contractual or business, definition of customer's profile is mandatory (what is expected from him/it and the relationship with the reporting party), mainly taking into account:

1.1.1. Identification of Customer, as per Chapter 2, item 2.

1.1.2. Type of activity.

1.1.3. Services to be used and motive for their choice.

1.1.4. Estimated transaction volume.

1.1.5. Willingness to provide information requested.

Data obtained to comply with the know your customer rule shall be updated when: unusual transactions are detected in accordance with the prudent assessment made by each financial institution; significant transactions are carried out; there are relatively important changes in the way transactions are conducted; and/or said update is deemed necessary in accordance with the risk management procedures adopted by the financial institution.

1.2 Throughout the course of the contractual or business relationship, following measures shall be taken:

1.2.1 Scrutiny of Transactions:

a. Adoption of risk management procedures;

b. Definition of parameters for each type of customer based upon their initial profile and in accordance with the risk management procedures adopted by the financial institution;

c. Data of each transaction shall be entered into a risk management system (profile vs. transaction). This step entails the analysis of every transaction carried out by a customer in order to verify whether it is consistent with his profile. Where any deviation, inconsistency or incoherence is detected, an in-depth analysis of the transaction must be performed for the purpose of getting additional information to confirm or dismiss the situation that has arisen.

1.2.2. Unusual or suspicious character of a transaction may also ground on elements such as volume, value, features, frequency and nature of the transaction in relation to customer's customary behaviour.

1.2.3. For the purposes of achieving a proper control over transactions carried out by customers, financial institutions shall set segmentation parameters or any other similar effective method, by level of risk, by type of service, or by any other criterion, which may lead to the detection of unusual transactions.

1.2.4. In order to make detection of said transactions easier, financial institutions shall implement information technology tools to ensure the broadest coverage and scope of their control mechanisms.

2. When to Report Suspicious Transactions:

2.1. When beginning the contractual or business relationship: when after evaluation of requirements under sections 1.1.1. to 1.1.5. of item 1.1 of this chapter, a transaction is deemed not viable, the customer refuses to provide the information

requested by the financial institution, the customer tries to reduce the information provided to the minimum, the customer provides false data or data difficult to be verified, or when any other situation without economic or lawful purpose arises.

2.2. Throughout the course of the contractual or business relationship: after evaluation of requirements under section 1.2.1 of item 1.2. of this chapter, deviations, inconsistencies and incoherencies arise between the transaction carried out and the customer's profile.

2.3. Completed as well as attempted suspicious transactions shall be reported.

2.4. When the financial institution detects facts or transactions that it deems susceptible to be reported in accordance with the analysis performed (period that shall not exceed six (6) months as from transaction date), said financial institution shall file a suspicious transaction report (STR), with enough merit and well founded opinion on the suspicion of the transaction/s reported.

2.5. The financial institution shall file the Suspicious Transaction Report to the Financial Information Unit within 48 hours as from the financial institution decides to file the report. All sufficient and necessary supporting documentation for its subsequent analysis by the FIU shall be attached to the STR.

VI. POLICIES AND PROCEDURES TO PREVENT THE LAUNDERING OF PROCEEDS OF CRIME AND FINANCING OF TERRORISM.

The executive board of the financial institution shall formally adopt a written policy in compliance with laws, rules and regulations to prevent the laundering of proceeds of crime and financing of terrorism, as well as an audit function to test the system.

The procedure to be adopted, notwithstanding the requirements set by the Central Bank of the Argentine Republic (B.C.R.A.), shall include at least:

1. Internal Control Procedure. Adoption and implementation of internal controls (appropriate structures, procedures and electronic systems) to ensure compliance with all laws, rules and regulations against laundering of proceeds of crime and financing of terrorism;

2. Compliance Officer (Responsible Officer). A senior officer shall be appointed as responsible for ensuring compliance and implementation of necessary controls and procedures to prevent laundering of proceeds of crime and financing of terrorism.

Most important functions of the compliance officer are as follows:

- To design and propose to the financial institution procedures and controls against laundering of proceeds of crime and financing of terrorism.
- To analyze unusual transactions and if appropriate, to file Suspicious Transaction Reports (STRs) to the FIU, when such a decision is made by the financial institution.
- To monitor by means of the financial institution's internal procedures, the implementation of the preventive measures adopted.
- To propose a training programme.
- To centralize information requests made by competent authorities.
- To make requests for the purposes of implementing the regulatory requirements within the financial institution where the compliance officer fulfils its function.

Staff Training: Adoption of a formal staff training programme.

Audits: Implementation of periodic audits independent from the global anti-money laundering/financing of terrorism program, in order to ensure the achievement of stated objectives.

These policies and procedures shall be made available for the relevant area of the Central Bank of the Argentine Republic and the Financial Information Unit.

APPENDIX II

GUIDE TO UNUSUAL OR SUSPICIOUS TRANSACTIONS WITHIN THE SPHERE OF THE FINANCIAL AND FOREIGN EXCHANGE MARKET

Transactions included in this guide, whether completed or attempted, do not necessarily constitute a suspicious transaction. They are just examples of transactions that may be used for laundering of proceeds of crime and financing of terrorism.

Considering the intrinsic features of the money laundering and terrorism financing crimes, as well as the dynamic nature of typologies, transactions to be included herein call for a periodical revision. International experience has evidenced the impossible quest for an absolutely complete guide to transactions which may cover all cases to consider. Therefore, the concept of previous paragraph shall prevail.

This Guide is meant to complement the general rules passed by this Unit onto the reporting parties of the sector.

— LAUNDERING OF PROCEEDS OF CRIME

I.- Cash Transactions.

1. Unusual significant cash deposits and/or withdrawals made by natural or artificial persons when they usually use cheques or other financial instruments and/or their stated activity is not normally associated with that type or volume of transactions.
2. Significant increase in cash deposits made by natural or artificial persons with no apparent purpose, especially when deposits are shortly transferred to a location usually unrelated to the customer.
3. Several small-amounted cash deposits that in the aggregate are significant.
4. Significant amounts of low-denomination bills are exchanged for higher denomination bills.
5. Deposits or other transactions that involve counterfeit instruments or instruments of doubtful authenticity.
6. Significant cash deposits at out of hours, thus avoiding direct contact with the financial institution's staff.
7. Frequent or substantial foreign currency exchanges (foreign currency into Argentine pesos or vice versa) made through the cashier, which are atypical of the customer's business or professional activity.
8. Frequent cash deposits made through the cashier or night safes; or significant withdrawals made through the cashier when there is no apparent business purpose.
9. A customer does not make cash deposits when his business activity calls for intensive use of ready cash.

II.- Bank Account Transactions

1. A customer is not qualified to conduct a transaction, considering his stated profile, giving ground thus to the suspicion of acting on other's behalf.
2. Different accounts in the name of the same customer when the total amount deposited is highly significant and keeps no relation to his stated business activity.
3. Accounts in the name of natural or artificial persons credited with large amounts of money not clearly related to the account holder's business or activity.
4. When opening an account, the customer refuses to provide information required by the financial institution, attempts to reduce the level of information provided to the minimum or provides information that is misleading or difficult to verify.
5. Settlement of payments by means of deposits credited on the same day or the day before.
6. Substantial deposits or withdrawals related to accounts which have been dormant for long periods.
7. Accounts receiving huge sums of money from abroad, these sums being inconsistent with customary activity.
8. Customers jointly and simultaneously using individual cash-tellers to make substantial financial transactions or operations in foreign currency.
9. Increased frequency in the use of safe, compared to customary activity.
10. A company's agent avoids contact with the financial institution.
11. A customer refuses to provide information that would normally enable him to receive a loan or any other banking service.

12. A large number of individuals conduct transactions on the same account with no adequate explanation.

13. Accounts frequently credited with funds from the so-called “Tax Havens” or from countries or territories designated as non-cooperative by FATF, as well as frequently significant wire transfers to abovementioned countries.

14. Large-amounted transactions carried out through international wire transfers or electronic means of payment, which are normally associated with the customer’s business activity.

15. An account that is virtually dormant, which sporadically receives or sends significant amounts and there is no purpose for these transactions or they are atypical of the customer’s profile and business activity.

16. An account opened by a legal entity or an organisation that has the same address as other legal entities or organisations but for which the same person or persons have signature authority, when there is no apparent economic or legal reason for such an arrangement (for example, individuals serving as company directors for multiple companies headquartered at the same location, etc.). Special attention should be paid when any of these legal entities or organisations is located at tax havens or their corporate purpose is “off-shore” transactions.

17. An account for which several persons have signature authority, yet these persons appear to have no relation among each other (either family ties or business relationship).

18. An account opened in the name of a legal entity, a foundation, an association or credit union that shows movements of funds above the expected level of income, without legal or economic purpose taking into account the stated activity and customer’s profile.

III.- Foreign Trade Transactions.

1. Change of name and address of beneficiary to the Bill of Credit just before payment accrual.
2. Change of payment place of the Bill of Credit.
3. Transactions by means of Bills of Credit and other negotiable instruments to move funds among countries where said trade is unusual compared to the customer's regular activity.
4. Foreign trade transactions – imports and exports – highly sophisticated carried out by means of various mechanisms where there is no actual movement of merchandise.
5. Forged exports or overbilling/underbilling of export transactions.
6. Forged imports or overbilling/underbilling of import transactions.
7. Foreign trade transactions priced inconsistently with market prices, or when their volume greatly differ from usual volumes traded by customer and/or sector.
8. Wire transfers which lack data needed to re-construct the transaction.
9. Foreign trade transactions – especially transfers – where originator or beneficiary is a foundation, association or any other non-profit entity unable to convincingly evidence the origin of funds involved. Additionally, same origin must perfectly fit the profile of customer declared by said entity.

IV.- Investment-related Transactions

1. Investments for trading commercial papers secured at the financing entity, value of those is inconsistent with the Customer's business.
2. Deposits or transactions of "back-to-back" loans between branches, subsidiaries or bank branches in areas known as "Tax Havens" or countries or territories deemed as non-cooperative by FATF/GAFI.
3. Customer's request for services related to investment portfolio (whether foreign currency, stocks/shares or trusts), where the fund source is unclear or not consistent with the customer's profile.
4. Significant and unusual transactions through trust fund accounts.
5. Frequent use of special investment accounts by irregular customers when holder of account is the very financial entity. Example: transactions related to mutual funds.
6. Regular transactions with negotiable instruments — securities & bonds —, by means of trading them on the day, in identical volume and nominal values, while taking advantage of quotation differences. These are not consistent with the customer's declared activity and profile.

V.- Transactions related to international activity

1. Transfers of large amounts of money to-and-fro abroad, where instructions are to pay cash.
2. Customers referred by a branch, subsidiary or foreign bank located in countries or territories deemed as "Tax Havens" or non-cooperative by FATF/GAFI.
3. Customers making or receiving regular payments involving large amounts of money, including wire transactions, to and from countries deemed as "Tax Havens" or non-cooperative by FATF/GAFI.

4. Accrual of large balances inconsistent with the sales or billing operation of customer and subsequent transfers to accounts abroad.
5. Wire or electronic transfers of funds carried out by customer, under circumstances of immediate credit and debit or even without passing through his account.
6. Frequent transactions by means of traveller's checks, foreign money orders or any other negotiable instrument, inconsistent with the customer's declared activity and profile.
7. International transactions for customers/accounts without having required antecedents on them or where they are inconsistent with the customer's declared activity.
8. Wire or electronic transfers of large amounts of money without data allowing the clear identification of said transactions.
9. Use of many personal accounts or non-profit entities' or charity entities' to collect funds and then transfer them immediately or after a short period to beneficiaries abroad.
10. Transactions of any type whatsoever where customers object to produce standard required information, give insufficient information whether false or difficult to be verified by the financial/exchange entity.

VI.- Transactions on guaranteed or non-guaranteed loans.

1. Customers who cancel their loans unexpectedly.
2. Loans guaranteed by securities deposited in the financial entity or by third parties, origin of which is unknown or amounts are not consistent with the status of borrower.

3. Customer's application to be granted financing by the financial entity when the customer is unable to evidence his capacity to pay in virtue of inconsistency with declared activity or because of lack of elements required to determine origin of funds to be used to settle the amount due. Special attention must be paid to loans relating to acquisition of real estate or other assets subject to register.
4. Loans secured by third parties who apparently have no relationship to customer.
5. Mortgages or loans secured by real estate, when cancellation is to be formalized in a different jurisdiction.
6. Where foreclosure is enforced to devalue or redeem loans. Special attention should be paid when their amounts were used in legal commercial activities or transferred to other company, person or entity without apparent reason to ground it.
7. Sale of properties seized by creditor where there is no legal ground to prove origin of funds used by buyer of said properties or his capacity to pay.
8. Customers asking for loans on working capital and upon its crediting they immediately transfer funds to accounts abroad, without having any legal or economic ground for that.
9. Customers asking for loans which may be linked to term deposits.

VII.- Other cases

1. Special attention should be paid to officers or employees to the financial institution who suddenly change their life style or refuse to take their holidays.
2. Special attention should be paid to officers or employees to the financial institution who give their home address to receive customers' documentation.

3. Special attention should be paid to officers or employees to the financial institution who evidence a sudden and/or unusual increase of operations.
4. Special attention should be paid to transactions carried out by politically exposed persons, where they are not consistent with the declared activity and profile under their character of customers.

— FINANCING OF TERRORISM

Where a financial institution suspects or has reasonable grounds to suspect that funds are related to terrorism, terrorist acts, or terrorist organizations, said financial institution shall file a report to the Financial Information Unit immediately.

Financial institutions shall refer to this guide and any other available information (i.e. terrorists and/or terrorist organizations lists from the United Nations Security Council Resolutions, official lists from the European Union, the United States of America, the United Kingdom and Canada, which can be accessed by clicking on the link available at the FIU website (www.uif.gov.ar), the intrinsic nature of the transaction and parties involved, as well as relevant international recommendations.

Where a financial institution detects one or more of the factors included in this guide, such factors shall be regarded as a clue to enhance the analysis of the transaction. However, should one of these factors appear, this does not mean that the transaction is necessarily suspected of being related to the financing of terrorism.

I. Accounts

1. Accounts that receive relevant periodical deposits and are dormant at other periods. These accounts are then used in creating a legitimate appearing financial background through which additional fraudulent activities may be carried out.
2. A dormant account containing a minimal sum suddenly receives a deposit or series of deposits followed by daily cash withdrawals that continue until the transferred sum has been removed.

3. When opening an account, the customer refuses to provide information required by the financial institution, attempts to reduce the level of information provided to the minimum or provides information that is misleading or difficult to verify.
4. An account for which several persons have signature authority, yet these persons appear to have no relation among each other (either family ties or business relationship).
5. An account opened by a legal entity or an organisation that has the same address as other legal entities or organisations but for which the same person or persons have signature authority, when there is no apparent economic or legal reason for such an arrangement (for example, individuals serving as company directors for multiple companies headquartered at the same location, etc.).
6. An account opened in the name of a recently formed legal entity and in which a higher than expected level of deposits are made in comparison with the income of the founders of the entity.
7. The opening by the same person of multiple accounts into which numerous small deposits are made that in aggregate are not commensurate with the expected income of the customer.
8. An account opened in the name of a legal entity that is involved in the activities of an association or foundation whose aims are related to the claims of a terrorist organisation.
9. An account opened in the name of a legal entity, a foundation or an association, which may be linked to a terrorist organization and that shows movements of funds above the expected level of income.

10. Customers hold accounts with neighbouring financial institutions and consolidate the funds in one account; subsequently, funds are transferred to other markets.

11. Accounts in the name of the same accountholder or in the name of relatives or third parties, are opened or closed without leaving documentary trails (for instance, an account is closed and the remaining funds are withdrawn in cash; subsequently, the funds are deposited in a new account).

II Deposits and withdrawals

1. Deposits for a business entity in combinations of monetary instruments that are atypical of the activity normally associated with such a business (for example, deposits that include a mix of business, payroll and social security cheques).

2. Large cash withdrawals made from a business account not normally associated with cash transactions.

3. Large cash deposits made to the account of an individual or legal entity when the apparent business activity of the individual or entity would normally be conducted in cheques or other payment instruments.

4. Mixing of cash deposits and monetary instruments in an account in which such transactions do not appear to have any relation to the normal use of the account.

5. Multiple transactions carried out on the same day at the same branch of a financial institution but with an apparent attempt to use different tellers.

6. The structuring of deposits through multiple branches of the same financial institution or by groups of individuals who enter a single branch at the same time.

7. Cash deposits or withdrawals for amounts below Argentine pesos 30,000.

8. Presentation of uncounted funds for a transaction. Upon counting, the transaction is carried out by reducing the amount below Argentine pesos 30,000.

9. Deposits or withdrawals are carried out by using several financial instruments for amounts below Argentine pesos 30,000, particularly if the instruments are sequentially numbered.

10. Use of night safes or ATMs to make significant cash transactions, avoiding contact with the bank's staff.

11. Substantial increase of cash deposits made by natural or artificial persons with no apparent purpose, especially if such deposits are quickly transferred to a location apparently unrelated with the customer's activity.

III. Wire transfers

1. Wire transfers ordered in small amounts in an effort to avoid an amount over Argentine pesos 30,000.

2. Wire transfers to or for an individual where information on the originator, or the person on whose behalf the transaction is conducted, is not provided with the wire transfer, when the inclusion of such information would be expected.

3. Use of multiple personal and business accounts or the accounts of non-profit organisations or charities to collect and then funnel funds immediately or after a short time to a small number of foreign beneficiaries.

4. Foreign exchange transactions that are performed on behalf of a customer by a third party followed by wire transfers of the funds to locations having no apparent business connection with the customer or to countries of specific concern.

5. Immediate incoming and outgoing transfers, especially when customers request the transactions are not recorded in the account.

6. Incoming transfers from abroad which immediately are used to purchase financial instruments to pay third parties.

IV. Characteristics of the customer or his/her business activity

1. Funds generated by a business owned by individuals of the same origin or involvement of multiple individuals of the same origin from countries of specific concern acting on behalf of similar business types.

2. Shared address for individuals involved in cash transactions, particularly when the address is also a business location and/or does not seem to correspond to the stated occupation (for example student, unemployed, self-employed, etc.).

3. Stated occupation of the transactor is not commensurate with the level or type of activity (for example, a student or an unemployed individual who receives or sends large numbers of wire transfers, or who makes daily maximum cash withdrawals at multiple locations over a wide geographic area).

4. Regarding non-profit or charitable organisations, financial transactions for which there appears to be no logical economic purpose or in which there appears to be no link between the stated activity of the organisation and the other parties in the transaction.

5. A safe deposit box is opened on behalf of a commercial entity when the business activity of the customer is unknown or such activity does not appear to justify the use of a safe deposit box.

6. Unexplained inconsistencies arising from the process of identifying or verifying the customer (for example, regarding previous or current country of residence, country of

issue of the passport, countries visited according to the passport, and documents furnished to confirm name, address and date of birth).

7. Partial financing for an investment project is requested where the source of funds provided by the customer is doubtful.

8. A customer seems to act on behalf of a third party and is reluctant to disclose the beneficiary's true identity.

9. A customer requests management investment services where the source of funds is unclear or inconsistent with stated activity.

V. Transactions linked to non-cooperative jurisdictions or low-tax or zero-tax jurisdictions.

1. Transactions involving foreign currency exchanges that are followed within a short time by wire transfers to locations of specific concern (for example, countries designated by national authorities, FATF non-cooperative countries and territories, etc.).

2. Deposits are followed within a short time by wire transfers of funds, particularly to or through a location of specific concern (for example, countries designated by national authorities, FATF non-cooperative countries and territories, etc.).

3. A business account through which a large number of incoming or outgoing wire transfers take place and for which there appears to be no logical business or other economic purpose, particularly when this activity is to, through or from locations of specific concern.

4. The use of multiple accounts to collect and then funnel funds to a small number of foreign beneficiaries, both individuals and businesses, particularly when these are in locations of specific concern.

5. A customer obtains a credit instrument or engages in commercial financial transactions involving movement of funds to or from locations of specific concern when there appears to be no logical business reasons for dealing with those locations.

6. The opening of accounts of financial institutions from locations of specific concern.

7. Sending or receiving funds by international transfers from and/or to locations of specific concern.

APPENDIX III

SECTION 1

SUSPICIOUS TRANSACTION REPORT (STR1) LAW 25246 SECTION 21 SUBSECTION B

AMENDMENT OR SUPPLEMENTATION OF PREVIOUS REPORT? YES <input type="checkbox"/>	
NO <input type="checkbox"/>	
TYPE OF LEGALLY BOUND REPORTING PARTY	
<input type="checkbox"/>	011 Financial Entities
<input type="checkbox"/>	012 Investment Mutual Funds Portfolio – AFJP -
<input type="checkbox"/>	021 Exchange Entities (Law 18924)
<input type="checkbox"/>	022 Other foreign currency traders not authorized to transfer funds (Law 18924)
<input type="checkbox"/>	041 Stock Exchange Companies and Brokers
<input type="checkbox"/>	042 Electronic Open Market Agents
<input type="checkbox"/>	043 Investment Mutual Funds Management
<input type="checkbox"/>	044 Other securities and bonds traders
<input type="checkbox"/>	051 Trading Agents in Future and Option Markets
<input type="checkbox"/>	081 Insurance Companies
<input type="checkbox"/>	091 Traveler's Checks Emitting Companies
<input type="checkbox"/>	092 Credit Card Emitting or Operating Companies
<input type="checkbox"/>	151 Central Bank of the Republic of Argentina – BCRA -
<input type="checkbox"/>	152 Federal Bureau of Public Income – AFIP -
<input type="checkbox"/>	153 National Central Bureau of Insurance – SSN -
<input type="checkbox"/>	154 National Securities Exchange Commission – CNV -
<input type="checkbox"/>	155 General Superintendency of Corporations
<input type="checkbox"/>	161 Insurance Company Agents, Advisors and Operators under Law

20091 and Law 22400, amendments, related provisions and complements.

REPOPORTING PARTY IDENTIFICATION

Reporting party's name or denomination:			CUIL, CUIT, DNI, CI, CDI, # :	
Headquarter address:			Supervision	
City:	Province/County:	PO BOX:	BCRA <input type="checkbox"/> Others <input type="checkbox"/> CNV <input type="checkbox"/> None <input type="checkbox"/> SSN <input type="checkbox"/>	
Address of location where reported activity took place (if different from above):				
City:	Province/County :	PO BOX:	Other locations: <input type="checkbox"/>	
Contact's name:	Area/Sector:	Job/Position:	Phone #:	e-mail:

.....

.....

Signature
Name

Seal

Print Complete

TRANSACTION REPORTED – SUBJECTS**Section 2**

Page of

Subject's surname or denomination:		First Name:		Middle Name:		Sex Artificial M F Person <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	
Address:				CUIT, CUIL, DNI, CI, CDI # (AND TYPE) (*) : -- * ----- * -			
City:		Province/County:		PO BOX:		Country:	
Spouse's surname:		Name:		CUIT, CUIL, DNI, CDI, CI # (AND TYPE) (*) : -- * ----- * -			
Job/Position :	Job Code:	Phone#:	Birth Date: -- / -- / --	Nationality:	e-mail:		
Relationship with reported event (Direct, Indirect, Partner, Corporate Comptroller, etc.)							

Subject's surname or denomination:		First Name:		Middle Name:		Sex Artificial M F Person <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	
Address:				CUIT, CUIL, DNI, CDI, CI# (AND TYPE) (*) : -- * ----- * -			
City:		Province/County:		PO BOX:		Country:	
Spouse's surname:		Name:		CUIT, CUIL, DNI, CDI, CI# (AND TYPE) (*) : -- * ----- * -			
Job/Position :	Job Code:	Phone#:	Birth Date: -- / -- / --	Nationality:	e-mail:		
Relationship with reported event (Direct, Indirect, Partner, Corporate Comptroller, etc.)							

Use one form per person to completely identify parties intervening in the reported transaction. If more than three forms are needed, go onto other page of Section 2

and always fill in top right field where page number is indicated (Page ...) as well as total of Pages of Section 2 (of ...).

.....
Signature Seal Print Complete

Name

(*) Cross-out irrelevant acronyms.

REPORTED TRANSACTION

Section 3

Page ... of ...

Date or fiscal year of reported activity: As from -- / -- / ---- to -- / -- / ----		Currency of origin: \$ U\$S <input type="checkbox"/> Reales Uruguay Paraguay <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>		Others (state)
Amount in Pesos:				
Accounts or products where unusual activity was observed (direct relationship) or other related accounts or products (indirect relationship) *				
Type (CA, SA, etc.)**	Identification # (CBU, others)***	Currency	Transaction Amount \$	Relationship (D/I)

(*) Every account or product related to the reported transaction shall be described per row. If needed, continue onto other page of Section 3, always filling in top right field indicating number of page ("Page _____") and total of pages of Section 3 ("of _____").

(**) CA: Current Account; SA: Savings Account

(***) CBU: Unique Banking Identification

.....
Signature
Name

.....
Seal

.....
Print Complete

DESCRIPTION OF THE TRANSACTION REPORTED

If needed, continue onto another page of Section 4, always filling in top right field indicating number of page (“Page _____”) and total of pages of Section 4 (“of _____”).

.....
Signature
Name

.....
Seal

.....
Print Complete

TYPE OF UNUSUAL TRANSACTION BASED UPON KNOWLEDGE OF CUSTOMER AND EVIDENCED IN NON-JUSTIFIED/INCONSISTENT:	
<input type="checkbox"/> Increase of funds operated by customer. <input type="checkbox"/> Deposits in low currency bills. <input type="checkbox"/> Structuring of cash deposits. <input type="checkbox"/> Start-up or increase of transactions of various types. <input type="checkbox"/> Use of safe-deposit-boxes. <input type="checkbox"/> Trading of negotiable securities. <input type="checkbox"/> Funds from non-cooperative countries or territories (FATF-GAFI) or in lack of sufficient control of anti-money laundering offence.	<input type="checkbox"/> Transactions on foreign currency trading. <input type="checkbox"/> Applications for credits with guaranties secured in other entities. <input type="checkbox"/> Credit cancellation in advance. <input type="checkbox"/> Insurance policy cancellations in advance. <input type="checkbox"/> Transfer of funds under trust. <input type="checkbox"/> Trading of properties or bonds and securities for values inconsistent with market's <input type="checkbox"/> Transactions not mentioned in previous items.

Presentation of this report is governed by provisions of Section 18 of Law 25246 ("Section 18: no criminal or civil proceedings, whether commercial, labor, administrative or any other whatsoever, lie against a person or an entity for making a report in good faith in compliance with the duty to report").

.....
 Signature Seal Print Complete
 Name

LIST OF ACRONYMS AND MEANING

ACRONYMS	CASTELLANO – SPANISH	INGLÉS – ENGLISH
	sujeto obligado	Legally bound reporting party /reporting party / Obligated person, person bound to report.
B.C.R.A.	Banco Central de la República Argentina	Central Bank of the Republic of Argentina
C.D.I.	Código de Identificación	Identification Code
CBU	Clave Bancaria Única	Unique Banking Identification
CI	Cédula de Identidad	Personal Identification Document
CICAD/OAS – CICAD/OEA	Comisión Interamericana para el Control del Abuso de Drogas/Organización de Estados Americanos	Inter-American Drug Abuse Control Commission / Organisation of American States
CUIL	CUIL: Clave Única de Identificación Laboral	Employee Identification Number
CUIT	CUIT: Clave Única de Identificación Tributaria	Taxpayer Identification Number
DNI	Documento Nacional de Identidad	National Identity Document
FATF/GAFI	FATF/GAFI: Grupo de Acción Financiera Internacional	Financial Action Task Force on Money Laundering
I.D.	Documento de Identidad	Identification Document
L.C.	Libreta Cívica	Personal identity document (for women)
L.E.	Libreta de Enrolamiento	Personal identity document (for men)
MEP	Medios Electrónicos de Pago	Electronic Means of Payment
UIF	Unidad de Información Financiera	Financial Information Unit – FIU
L.C.	Libreta Cívica	Personal identity document (for women)
L.E.	Libreta de Enrolamiento	Personal identity document (for men)