



**ITAU CORPBANCA  
SANTIAGO, CHILE**  
Updated April 1st, 2016

**STATEMENT OF ANTI MONEY LAUNDERING POLICIES AND PROCEDURES**

**DOMICILE**

Itaú CorpBanca (the "Bank") is a commercial bank established in 1871 and organized under the laws of the Republic of Chile. Its operations were authorized by Supreme Decree Nr. 318. Its Head Office is located in Rosario Norte 660, Santiago, Chile. Its Tax ID number is 97.023.000-9.

**OWNERSHIP**

Shares of the Bank are listed both on the Santiago, Chile and the New York Stock Exchange (NYSE), USA. The majority shareholder is Itaú UniBanco (33.58%).

**LAWS AND SUPERVISION**

- The Republic of Chile has enacted laws and regulations on anti-money laundering (AML) that apply to all banks, their branches and subsidiaries. The main legislation is found in Law Nr. 19.913 and Law Nr. 20.393 as well as in Chapter 1-14 of the Superintendence of Banks regulations.
- All banks in Chile are supervised by the Superintendence of Banks and Financial Institutions (SBIF).
- As a company listed in the New York Stock Exchange (NYSE), the Bank complies with the Securities and Exchange Commission's regulations, Sarbanes Oxley Act of 2002 and Securities Exchange Act of 1934, where applicable.

**ITAU CORPBANCA POLICIES**

- The Bank has, and enforces, a strict written policy to combat money laundering that applies to its head office, all domestic branches and subsidiaries, as well as the New York, USA branch.
- Itaú CorpBanca's AML and KYC Compliance Program require approval of a senior committee.
- The Bank's policies stipulate internal controls and procedures, especially relating to "Know Your Customer" (KYC), operations analysis and suspicious activities reports.
- The Bank has implemented a Training Program on AML-KYC matters for all employees.
- The Bank requires from all of its checking account customers independent proof of identity, verifies address and employment, ID Card, income verification, photograph, digital print and control of credit history.
- The Bank is required by law to file a report on suspicious activity. This report is submitted to the UAF (Unidad de Análisis Financiero), a department of the Ministry of Finance which is in charge of prevention and impede the utilization of the Financial System to perpetrate money laundering crimes.



- As per Chilean Law, the Bank maintains on file all relevant data on its customers for a period of up to six years.
- The Bank has established a system to detect accounts and transactions where the clients are in the OFAC list.
- The Bank has separate and independent audit and compliance functions, defined by written policies.
- The Bank has implemented a special software to aid in the detection of suspicious activities or patterns of activity.
- Bank policy does not permit business with "shell banks", including correspondent relationships.
- The Bank does not operate anonymous accounts.
- Bank policy does not permit operate "Payable-Through Accounts" either locally or abroad or allows foreign banks to operate through Itaú CorpBanca's accounts with our worldwide correspondents.
- Bank's customers are not allowed to channel any payment activity directly through Itaú CorpBanca's accounts with foreign correspondents.
- As a matter of policy, the Bank does not operate with correspondent banks which originate in certain jurisdictions such as non-cooperative countries or territories.
- The Bank has a written policy governing the opening process of all accounts of PEP's (Politically Exposed Persons), both foreign and domestic.
- The Bank has not been investigated or been involved with any case involving AML.
- The Bank is certified under the crime prevention model (Modelo de Prevención de Delitos MPD) covered by law Nr. 20.393

#### **COMPLIANCE**

- Mr. Felipe Cuadra Campos is the Compliance Officer of Itaú CorpBanca.

Itaú CorpBanca, Chile



Milton Maluhy Filho  
Chief Executive Officer