

Financial Institution Name: Location (Country) :

Cassa Centrale Banca - Credito Cooperativo Italiano S.p.A. Italy

The questionnaire is required to be answered on a Legal Entity (LE) Level. The Financial Institution should answer the questionnaire at the legal entity level including any branches for which the client base, products and control model are materially similar to the LE Head Office. This questionnaire should not cover more than one LE. Each question in the CBDDQ will need to be addressed from the perspective of the LE and on behalf of all of its			
branches. If a r	branches. If a response for the LE differs for one of its branches, this needs to be highlighted and details regarding this difference captured at the end of each sub-section. If a branch's business activity (products offered, client		
	terially different than its Entity Head Office, a separate questionnaire car		
No #	Question & OWNERSHIP	Answer	
1. EN1111 1	Full Legal Name		
•			
		Cassa Centrale Banca - Credito Cooperativo Italiano S.p.A.	
2	Append a list of foreign branches which are covered by		
	this questionnaire		
3	Full Legal (Registered) Address		
		Via Segantini, 5 - 38122 Trento	
4	Full Primary Business Address (if different from above)		
5	Date of Entity incorporation/establishment		
		1974	
6	Select type of ownership and append an ownership chart if available		
		AL CONTRACTOR OF A CONTRACTOR OFTA C	
6 a 6 a1	Publicly Traded (25% of shares publicly traded) If Y, indicate the exchange traded on and ticker symbol	No	
oai	In T, indicate the exchange traded of and ticker 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 beneficial		
	owners with a holding of 10% or more	There are no shareholders or ultimate beneficial owners with a holding of 10% or more	
7	% of the Entity's total shares composed of bearer shares		
		0	
0	Doos the Entity or any of its branches, operate under an		
8	Does the Entity, or any of its branches, operate under an Offshore Banking License (OBL)?	Νο	
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	no	
40	services only through online channels?		
10	Name of primary financial regulator/supervisory authority		
		Bank of Italy and European Central Bank as per Article 2(20) of Regulation (EU) No 468/2014 of the European Central Bank of 16 April 2014	
		Central Bank of 16 April 2014	
11	Provide Legal Entity Identifier (LEI) if available		
	I TOTAL LEYAL LINKY INCHANCE (LEI) II AVAIIADIE		
		LOO0AWXR8GF142JCO404	
12	Provide the full legal name of the ultimate parent (if		
- <u>-</u>	different from the Entity completing the DDQ)		
13	Jurisdiction of licensing authority and regulator of ultimate		
-	parent	Italy - Bank of Italy and European Central Bank as per Article 2(20) of Regulation (EU) No 468/2014 of the	
		European Central Bank of 16 April 2014	
14	Select the business areas applicable to the Entity		
14 a	Retail Banking	Yes	

No #	Question	Answer
14 b	Private Banking	Yes
14 c	Commercial Banking	Yes
14 d	Transactional Banking	Yes
14 e	Investment Banking	No
14 e	Financial Markets Trading	Yes
14 g	Securities Services/Custody	Yes
14 g	Broker/Dealer	Yes
14 i	Multilateral Development Bank	No
	Wealth Management	Yes
14 j 14 k	Other (please explain)	165
14 K	Curei (piease explain)	Starting from 1st Jan 2019 Cassa Centrale Banca is the Head of the Banking Group and leads the associated co- operative banks.
15	Does the Entity have a significant (10% or more) portfolio of non-resident customers or does it derive more than 10% of its revenue from non-resident customers? (Non- resident means customers primarily resident in a different jurisdiction to the location where bank services are provided)	Νο
15 a	If Y, provide the top five countries where the non-resident customers are located.	
16	Select the closest value:	
16 a	Number of employees	501-1000
16 b	Total Assets	Greater than \$500 million
17	Confirm that all responses provided in the above Section	Greater than \$500 million
17	are representative of all the LE's branches.	Yes
17 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
18	If appropriate, provide any additional information/context to the answers in this section.	
	JCTS & SERVICES	
19	Does the Entity offer the following products and services:	
13	bes the Entry oner the following products and services.	
19 a	Correspondent Banking	Yes
19 a1	lif Y	
19 a1a	Does the Entity offer Correspondent Banking services to domestic banks?	Yes
19 a1b	Does the Entity allow domestic bank clients to provide downstream relationships?	No
19 a1c	Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks?	Yes
19 a1d	Does the Entity offer Correspondent Banking services to foreign banks?	No
19 a1e	Does the Entity allow downstream relationships with foreign banks?	No
19 a1f	Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks?	Yes
19 a1g	Does the Entity offer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTSs)?	Νο
19 a1h	Does the Entity allow downstream relationships with MSBs, MVTSs, or Payment Service Provider (PSPs)?	
	wobs, we ros, or rayment before riovider (rors):	
19 a1h1		No
	MSBs	No No

CLASSIFICAZIONE: INTERNO

to identify dow /MVTSs/PSPS 19 b Cross-Border 19 c Cross-Border 19 d Domestic Bulk 19 e Hold Mail 19 f International C 19 g Low Price Sec 19 h Payable Throu 19 i Payment serv offer third part 19 i Payment serv offer third part 19 i Payment serv offer third part 19 i Payable Throu 19 i Payable Throu 19 i Payable Throu 19 i Payable Throu 19 i Check cashing 19 p For each of th the service to level of due di 19 p1 Check cashing 19 p2a If yes, state th 19 p3 Foreign currer 19 p3 If yes, state th 19 p4 Sale of Monet 19 p4 If yes, state th	Bulk Cash Delivery Remittances (Cash Delivery Cash Letter Curifies Ugh Accounts Cices to non-bank entities who may then by payment services to their customers? elect all that apply below? ayment Service Providers Service Providers Service Providers Platforms a explain	Answer Yes No Yes No No
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19 p4a If yes, state th	e applicable level of due diligence	
		No
19 p5 If you offer oth	e applicable level of due diligence	
	her services to walk-in customers please detail here, including describing the level of	Cassa Centrale Banca doesn't offer services to walk-in customers
19 q Other high-risk Entity (please	k products and services identified by the specify)	No other high-risk products and services identified
are representa	Il responses provided in the above Section ative of all the LE's branches.	Yes
	ich questions the difference/s relate to and that this applies to.	
	provide any additional information/context s in this section.	
3. AML, CTF & SANCT	IONS PROGRAMME	
22 Does the Entit AML, CTF and following com	ty have a programme that sets minimum d Sanctions standards regarding the ponents:	
	icer with sufficient experience/expertise	Yes
	mation Screening	Yes
22 c Beneficial Ow	nership	Yes
22 d Cash Reportir		Yes
22 e CDD	~	Yes
22 f EDD		Yes
22 g Independent T	Festing	Yes
		Yes
22 i Policies and P		Yes
22 j PEP Screenin		Yes
22 k Risk Assessm	nent	Yes
22 I Sanctions		Yes

22 m Suppose A show the profile of the second base of the Second bas	No #	Question	Answer
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55 Does the Board receive, sases, and challenge register version of same, CTA & Mark, CTA & Samola, CTA & Samola & CTA & Samola			
sporting response Yes 63 Components of La AML_CTF. 8 Standards programme? No 72 Codes the standard have a statistication of programme? Yes 73 Codes the statistication as a statistication of programme? Yes 74 Codes the statistication as a statistication of statisticatististatistication of statistatistication of statistati	25		
integration integration 20 Deturble to third parties to carry out any concorrents of the ALL, CFF & Sunctions programme? No 26 07 Provide further details No 27 Does the early have a situated/over policy? Yes. 28 Confirm that all response provide in the above policy? Yes. 29 If appropriate provide and the target policy and the above policy? Yes. 29 If appropriate provide and the target policy and the above policy? Yes. 20 If appropriate provide any additional information/context to the search in this score/ to the search in this score/ construction when policy above policy and the above policy? Yes. 20 If appropriate provide any additional information/context to the score/ provide when policy above policy and the above policy approximate the above policy and the above policy and the above policy and the above policy approximate the above approximate the abo			Yes
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30 Has the Entity documented policies and procedures consistent with applicable ABC regulations and requirements to reasonably prevent, detect and report Yes 31 Does the Entity appointed a designated of theor or officers or officers or coordinating the ABC regulations responsible for a constraints the ABC regulations of the ABC regulations and therethere ABC regulatins the theret and abstrate			
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inherent risk assessment? 40 Does the Entity's ABC EWRA cover the inherent risk components detailed below: 40 a Potential liability created by intermediaries and other third-party providers as appropriate 40 b Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries 40 c Transactions, products or services, including those that involve state-controlled entities or public officials 40 d Corruption risks associated with gifts and hospitality, hiring/internships, charitable donations and political	39	LOUGA LIE ETIMA HAVE AN ADLY TESIONAL LISK FATING THAT IS	
40 Does the Entity's ABC EWRA cover the inherent risk components detailed below: 40 a Potential liability created by intermediaries and other third-party providers as appropriate 40 b Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries Yes 40 c Transactions, products or services, including those that involve state-controlled entities or public officials Yes 40 d Corruption risks associated with diffs and hospitality, hiring/internships, charitable donations and political Yes	39		Yes
components detailed below: 40 a Potential liability created by intermediaries and other third- party providers as appropriate 40 b Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries 40 c Transactions, products or services, including those that involve state-controlled entities or public officials 40 d Corruption risks associated with gifts and hospitality, hiring/internships, charitable donations and political	39	the net result of the controls effectiveness and the	Yes
40 a Potential liability created by intermediaries and other third- party providers as appropriate Yes 40 b Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries Yes 40 c Transactions, products or services, including those that involve state-controlled entities or public officials Yes 40 d Corruption risks associated with gifts and hospitality, hiring/internships, charitable donations and political Yes		the net result of the controls effectiveness and the inherent risk assessment?	Yes
party providers as appropriate Yes 40 b Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries Yes 40 c Transactions, products or services, including those that involve state-owned or state-controlled entities or public officials Yes 40 d Corruption risks associated with gifts and hospitality, hiring/internships, charitable donations and political Yes	39 40	the net result of the controls effectiveness and the inherent risk assessment? Does the Entity's ABC EWRA cover the inherent risk	Yes
40 b Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries Yes 40 c Transactions, products or services, including those that involve state-controlled entities or public officials Yes 40 d Corruption risks associated with gifts and hospitality, hiring/internships, charitable donations and political Yes		the net result of the controls effectiveness and the inherent risk assessment? Does the Entity's ABC EWRA cover the inherent risk components detailed below:	
through intermediaries 40 c Transactions, products or services, including those that involve state-owned or state-controlled entities or public officials Yes 40 d Corruption risks associated with gifts and hospitality, hirring/internships, charitable donations and political Yes	40	the net result of the controls effectiveness and the inherent risk assessment? Does the Entity's ABC EWRA cover the inherent risk components detailed below: Potential liability created by intermediaries and other third-	
through intermediaries 40 c Transactions, products or services, including those that involve state-controlled entities or public officials 40 d Corruption risks associated with gifts and hospitality, hiring/internships, charitable donations and political Yes	40	the net result of the controls effectiveness and the inherent risk assessment? Does the Entity's ABC EWRA cover the inherent risk components detailed below: Potential liability created by intermediaries and other third- party providers as appropriate	
involve state-owned or state-controlled entities or public Yes officials 40 d Corruption risks associated with gifts and hospitality, hirring/internships, charitable donations and political Yes	40 40 a	the net result of the controls effectiveness and the inherent risk assessment? Does the Entity's ABC EWRA cover the inherent risk components detailed below: Potential liability created by intermediaries and other third- party providers as appropriate Corruption risks associated with the countries and	Yes
officials 40 d Corruption risks associated with gifts and hospitality, hirring/internships, charitable donations and political Yes	40 40 a	the net result of the controls effectiveness and the inherent risk assessment? Does the Entity's ABC EWRA cover the inherent risk components detailed below: Potential liability created by intermediaries and other third- party providers as appropriate Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries	Yes
40 d Corruption risks associated with gifts and hospitality, hirring/internships, charitable donations and political Yes	40 40 a	the net result of the controls effectiveness and the inherent risk assessment? Does the Entity's ABC EWRA cover the inherent risk components detailed below: Potential liability created by intermediaries and other third- party providers as appropriate Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries Transactions, products or services, including those that	Yes Yes
hiring/internships, charitable donations and political Yes	40 40 a 40 b	the net result of the controls effectiveness and the inherent risk assessment? Does the Entity's ABC EWRA cover the inherent risk components detailed below: Potential liability created by intermediaries and other third- party providers as appropriate Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries Transactions, products or services, including those that involve state-owned or state-controlled entities or public	Yes Yes
	40 40 a 40 b 40 c	the net result of the controls effectiveness and the inherent risk assessment? Does the Entity's ABC EWRA cover the inherent risk components detailed below: Potential liability created by intermediaries and other third- party providers as appropriate Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries Transactions, products or services, including those that involve state-owned or state-controlled entities or public officials	Yes Yes
Icontributions	40 40 a 40 b	the net result of the controls effectiveness and the inherent risk assessment? Does the Entity's ABC EWRA cover the inherent risk components detailed below: Potential liability created by intermediaries and other third- party providers as appropriate Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries Transactions, products or services, including those that involve state-owned or state-controlled entities or public officials Corruption risks associated with gifts and hospitality,	Yes Yes Yes
	40 40 a 40 b 40 c	the net result of the controls effectiveness and the inherent risk assessment? Does the Entity's ABC EWRA cover the inherent risk components detailed below: Potential liability created by intermediaries and other third- party providers as appropriate Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries Transactions, products or services, including those that involve state-owned or state-controlled entities or public officials Corruption risks associated with gifts and hospitality, hiring/internships, charitable donations and political	Yes Yes Yes

CLASSIFICAZIONE: INTERNO

No #	Question	Answer
40 e	Changes in business activities that may materially	Yes
	increase the Entity's corruption risk	Tes
41	Does the Entity's internal audit function or other	
	independent third party cover ABC Policies and	Yes
	Procedures?	
42	Does the Entity provide mandatory ABC training to:	
42 a	Board and senior Committee Management	Yes
42 b	1st Line of Defence	Yes
42 c	2nd Line of Defence	Yes
42 d	3rd Line of Defence	Yes
42 e	Third parties to which specific compliance activities subject to ABC risk have been outsourced	Not Applicable
42 f	Non-employed workers as appropriate (contractors/consultants)	Not Applicable
43	Does the Entity provide ABC training that is targeted to specific roles, responsibilities and activities?	Yes
44	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
44 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
45	If appropriate, provide any additional information/context	
	to the answers in this section.	
		[
	TF & SANCTIONS POLICIES & PROCEDURES	
46	Has the Entity documented policies and procedures	
	consistent with applicable AML, CTF & Sanctions	
	regulations and requirements to reasonably prevent,	
40 -	detect and report:	
46 a 46 b	Money laundering Terrorist financing	Yes Yes
	Sanctions violations	
46 c 47	Are the Entity's policies and procedures updated at least	Yes
	annually?	Yes
48	Has the Entity chosen to compare its policies and procedures against:	
48 a	U.S. Standards	No
48 a1	If Y, does the Entity retain a record of the results?	
48 b	EU Standards	Yes
48 b1	If Y, does the Entity retain a record of the results?	Yes
49	Does the Entity have policies and procedures that:	
49 a	Prohibit the opening and keeping of anonymous and fictitious named accounts	Yes
49 b	Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs	Yes
49 c	Prohibit dealing with other entities that provide banking services to unlicensed banks	Yes
49 d	Prohibit accounts/relationships with shell banks	Yes
49 e	Prohibit dealing with another entity that provides services to shell banks	Yes
49 f	Prohibit opening and keeping of accounts for Section 311 designated entities	Yes
49 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	Yes
1	Assess the risks of relationships with domestic and	

No #	Question	Answer
49 i	Define the process for escalating financial crime risk	
	issues/potentially suspicious activity identified by	Yes
-	employees	
49 j	Define the process, where appropriate, for terminating	Yes
	existing customer relationships due to financial crime risk	Yes
49 k	Define the process for exiting clients for financial crime	<u> </u>
• ···	reasons that applies across the entity, including foreign	Yes
	branches and affiliates	
49 I	Define the process and controls to identify and handle	
	customers that were previously exited for financial crime	Yes
49 m	reasons if they seek to re-establish a relationship Outline the processes regarding screening for sanctions,	
49 111	PEPs and Adverse Media/Negative News	Yes
10	Outline the processes for the maintenance of internal	
49 n	"watchlists"	Yes
50	Has the Entity defined a risk tolerance statement or	
	similar document which defines a risk boundary around	Yes
	their business?	
51	Does the Entity have record retention procedures that	Yes
51 0	comply with applicable laws?	
51 a	If Y, what is the retention period?	
		5 years or more
50		
52	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
52 a	If N, clarify which questions the difference/s relate to and	
52 0	the branch/es that this applies to.	
53	If appropriate, provide any additional information/context	
55	to the answers in this section.	
6. AML, CTE	& SANCTIONS RISK ASSESSMENT	
	& SANCTIONS RISK ASSESSMENT	
6. AML, CTF 54	& SANCTIONS RISK ASSESSMENT Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:	
	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client	Yes
54 54 a 54 b	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product	Yes
54 54 a 54 b 54 c	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel	Yes Yes
54 a 54 b 54 c 54 d	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography	Yes
54 54 a 54 b 54 c	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls	Yes Yes
54 54 a 54 b 54 c 54 d 55	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below:	Yes Yes Yes
54 54 a 54 b 54 c 54 d 55 55 a	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls	Yes Yes
54 54 a 54 b 54 c 54 d 55	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring	Yes Yes Yes
54 54 b 54 c 54 c 54 d 55 55 55 a 55 b	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening	Yes Yes Yes Yes Yes
54 54 a 54 b 54 c 54 d 55 55 a 55 a 55 b 55 c	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification	Yes Yes Yes Yes Yes Yes Yes
54 54 a 54 b 54 c 54 d 55 a 55 a 55 a 55 c 55 d 55 c 55 d 55 c	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News	Yes Yes Yes Yes Yes Yes Yes Yes Yes
54 54 a 54 b 54 c 54 d 55 55 a 55 a 55 c 55 d 55 c 55 d 55 e 55 f	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education	Yes Yes Yes Yes Yes Yes Yes Yes Yes Yes
54 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 d 55 f 55 g	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance	Yes Yes Yes Yes Yes Yes Yes Yes Yes Yes
54 54 a 54 b 54 c 54 d 55 a 55 a 55 b 55 c 55	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information	Yes Yes Yes Yes Yes Yes Yes Yes Yes Yes
54 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 d 55 f 55 g	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in	Yes Yes Yes Yes Yes Yes Yes Yes Yes Yes
54 54 a 54 b 54 c 54 d 55 a 55 a 55 b 55 c 55	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information	Yes Yes Yes Yes Yes Yes Yes Yes Yes Yes
54 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 d 55 c 55 d 55 c 55 f 55 g 55 h 56	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months?	Yes
54 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 d 55 c 55 d 55 c 55 f 55 g 55 h 56	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA	Yes
54 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 d 55 c 55 d 55 c 55 f 55 g 55 h 56	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA	Yes Yes Yes Yes Yes Yes Yes Yes Yes Yes
54 54 b 54 b 54 c 54 d 55 a 55 b 55 c 55 d 55 c 55 d 55 f 55 h 56 56 a	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed.	Yes
54 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 d 55 c 55 d 55 c 55 f 55 g 55 h 56	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA	Yes Yes Yes Yes Yes Yes Yes Yes Yes Yes
54 54 b 54 b 54 c 54 d 55 a 55 b 55 c 55 d 55 c 55 d 55 f 55 h 56 56 a	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client	Yes
54 54 b 54 b 54 c 54 d 55 a 55 b 55 c 55 d 56 56 57 57 a 57 b	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product	Yes
54 54 b 54 c 54 c 54 d 55 a 55 b 55 c 55 f 56 a 57 57 a 57 b 57 c	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel	Yes Y
54 54 a 54 b 54 c 54 d 55 a 55 b 55 c 55 c 55 d 55 c 55 d 56 a 57 a 57 c 57 c 57 d	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography	Yes
54 54 b 54 c 54 c 54 d 55 a 55 b 55 c 55 f 56 a 57 57 a 57 b 57 c	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls	Yes Y
54 54 a 54 b 54 c 54 d 55 a 55 b 55 c 55 d 55 c 55 d 56 56 57 57 a 57 b 57 c 57 d 58	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below:	Yes
54 54 b 54 c 54 d 55 a 55 b 55 c 55 c 55 d 55 f 55 f 55 f 55 f 56 56 57 57 a 57 b 57 c 57 d 58 a	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: Customer Due Diligence	Yes
54 54 a 54 b 54 c 54 d 55 a 55 a 55 b 55 c 55 d 55 c 55 d 55 d 55 d 55 d 55 d 55 d 55 f 55 g 55 f 55 g 55 h 56 a 57 c 57 d 58 58 b	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: Customer Due Diligence Governance	Yes Y
54 54 54 54 54 54 54 54 54 54 54 54 54 54 54 54 54 54 55 55 55 55 55 55 56 56 57 57 57 57 57 57 57 57 57 57 57 57 57 58 58	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: Customer Due Diligence	Yes

No #	Question	Answer
58 e	Name Screening	Yes
58 f	Transaction Screening	Yes
58 g	Training and Education	Yes
50 g 59	Has the Entity's Sanctions EWRA been completed in the	
	last 12 months?	Yes
59 a	If N, provide the date when the last Sanctions EWRA	
	was completed.	
60	Confirm that all responses provided in the above Section	
	are representative of all the LE's branches	Yes
60 a	If N, clarify which questions the difference/s relate to and	
	the branch/es that this applies to.	
61	If appropriate, provide any additional information/context	
	to the answers in this section.	
7. KYC. CD	DD and EDD	
62	Does the Entity verify the identity of the customer?	Yes
63	Do the Entity's policies and procedures set out when	
	CDD must be completed, e.g. at the time of onboarding	Yes
	or within 30 days?	
64	Which of the following does the Entity gather and retain	
64 a	when conducting CDD? Select all that apply: Customer identification	Yes
64 a 64 b	Expected activity	Yes
64 c	Nature of business/employment	Yes
64 d	Ownership structure	Yes
64 e	Product usage	Yes
64 f	Purpose and nature of relationship	Yes
64 g	Source of funds	Yes
64 h	Source of wealth	Yes
65	Are each of the following identified:	
65 a	Ultimate beneficial ownership	Yes
65 a1	Are ultimate beneficial owners verified?	Yes
65 b	Authorised signatories (where applicable)	Yes
65 c 65 d	Key controllers Other relevant parties	Yes
65 a	What is the Entity's minimum (lowest) threshold applied	Yes
00	to beneficial ownership identification?	25%
67	Does the due diligence process result in customers	Vee
-	receiving a risk classification?	Yes
67 a	If Y, what factors/criteria are used to determine the	
	customer's risk classification? Select all that apply:	
67 a1	Product Usage	Yes
67 a2 67 a3	Geography Business Type/Industry	Yes Yes
67 a3 67 a4	Legal Entity type	Yes
67 a4	Adverse Information	Yes
67 a6	Other (specify)	
68	For high risk non-individual customers, is a site visit a	
	part of your KYC process?	No
68 a	If Y, is this at:	
68 a1	Onboarding	
68 a2	KYC renewal	
68 a3	Trigger event	
68 a4	Other	No
68 a4a	If yes, please specify "Other"	
69	Does the Entity have a risk based approach to screening	Y .
	customers for Adverse Media/Negative News?	Yes
60.0	If Y, is this at:	
69 a 69 a1	Onboarding	Yes
69 a 1	KYC renewal	Yes

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99 a3 Tagge overt Yes 20 Wat is emethod used by the Entry's osciencial Combination of automated and manual Combination automated and manual 11 Costsorter and connected parties is determine whether they are PEPs, controlled by PEPs? Yes 21 Wat is the method used by the Entry is screening the method automated and manual Yes 21 Wat is the method used by the Entry is screening the method used of			
70 Wink is the method used by the Entry to screen for here are PEN, or controlled by PEPa? Combination of automated and menual 71 Does the Entry more at this based approximated there are PEN, or controlled by PEPa? Yes 71 An entry there are at the based approximated there are PEN, or controlled by PEPa? Yes 71.a Tigger event Yes 72.a What is the method used by the Entry to screen PEPa? Combination of automated and menual 73.a Togger event Yes 74.a Togger event Yes 74.a Interview at distillation to deal on the automated and menual Combination of automated and menual 74.a Toger event at distillation toger event and processes to screen at automated program is to deal on the automated and menual Yes 74.a Intry revent at distillation toger event at the toger is toger event at automated is toger event at automated and menual Yes 74.a Intry revent at distillation toger event at the toger is toger event at a toger event at a distillation of toger event at automated and menual Yes 74.a Intry revent at distillation toger event at a toger event at at a toger event at a toger event at a toger event at a toger ev	No #	Question	Answer
Advance MediaNegative News7 Controllation of automated and manual 71 Does the Entry how at the Entry how at the automated and manual Yes 71 The Entry how at the Entry how at the entry how and the automated and manual Yes 71 The Entry how at the Entry how at the entry how and the ent			Yes
Address and consection based Yes 1 Address and consection by PEPo7 Yes 7 a Yes 7 b Yes 7 b SC creates and depthe for parameters and convector parties to depthe whether rely as orthogotta to pPEPs Yes 7 b SC creates and depthe for parameters based on reak Yes 7 b SC creates at definition frequencies Yes 7 b SC creates at definition frequencies Yes 7 a Conset the Entity maintain and report metrics on current Yes 7 a Conset the Entity maintain and report metrics on current Yes	0		Combination of automated and manual
customer and convected parties to determine whether they are PEPs, or controlled by PEPs? Yes 71 a) If yes are PEPs, or controlled by PEPs? President and the PEPs? 71 a) Trager event Yes 72 a) Trager event Yes 73 Trager event Yes 74 Trager event Yes 73 Trager event Yes 74 Test frequencies, pronodores and point so therem PEPs? Correlation of automated and manual 74 Test frequencies, controlled by PEPs? Ves 74 Test frequencies, second preprima frequencies, ves frequencie			
Hey are PEPs, or controlled by PEPs? Hes 71 af 0 Vis the st: Vis 71 af 0 Disbaseing Yes 72 What is the method used by the Entity to screen PEPs? Combination of automated and manual 73 Disc the Entity have policies, procedures and processes Combination of automated and manual 74 Disc the Entity have policies, procedures and processes Ves 74 Is KYC removed at definited incubes to screen PEPs? Combination of automated and manual 74 Is KYC removed at definited requencies based on risk. Yes 74 Is KYC removed at definited requencies based on risk. Yes 74 Is KYC removed at definited requencies based on risk. Yes 74 Is Age man one year No 74 Is Age man one year No 74 Less at an one year No 74 Constrained and approximation on reacting on registrained and manual Yes 74 Constrained and proximation on registrained and regi	'1		
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70 Deep EDD require conject hurinese management and/or			
78 Does EDD require senior business management and/or			Restriction based on an assesment case by case
78 Does EDD require senior business management and/or			
178 [Does EDD require senior business management and/or]			
	8		Yes
compliance approval?		compliance approval?	1

No #	Question	Answer
78 a	If Y indicate who provides the approval:	Both
79	Does the Entity have specific procedures for onboarding	
	entities that handle client money such as lawyers,	Yes
	accountants, consultants, real estate agents?	
80	Does the Entity perform an additional control or quality	Yes
	review on clients subject to EDD?	
81	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
81 a	If N, clarify which questions the difference/s relate to and	
	the branch/es that this applies to	
82	If appropriate, provide any additional information/context	
-	to the answers in this section.	
8. MONITO	RING & REPORTING	
83	Does the Entity have risk based policies, procedures and	
	monitoring processes for the identification and reporting	Yes
	of suspicious activity?	
84	What is the method used by the Entity to monitor	Combination of automated and manual
84 a	transactions for suspicious activities? If manual or combination selected, specify what type of	
04 a	transactions are monitored manually	
	······	Trade Finance activity, Credit/Loans granting
84 b	If automated or combination selected, are internal system	
•••	or vendor-sourced tools used?	Internal System
84 b1	If 'Vendor-sourced tool' or 'Both' selected, what is the	
	name of the vendor/tool?	
84 b2	When was the tool last updated?	1-2 years
84 b3	When was the automated Transaction Monitoring	< 1 year
85	application last calibrated? Does the Entity have regulatory requirements to report	
05	suspicious transactions?	Yes
85 a	If Y, does the Entity have policies, procedures and	
	processes to comply with suspicious transaction reporting	Yes
	requirements?	
86	Does the Entity have policies, procedures and processes to review and escalate matters arising from the	V
	monitoring of customer transactions and activity?	Yes
87	Does the Entity have a data quality management	
07	programme to ensure that complete data for all	Yes
	transactions are subject to monitoring?	
88	Does the Entity have processes in place to respond to	
	Request For Information (RFIs) from other entities in a	Yes
89	timely manner? Does the Entity have processes in place to send	
09	Requests for Information (RFIs) to their customers in a	Yes
	timely manner?	
90	Confirm that all responses provided in the above Section	Yes
	are representative of all the LE's branches	
90 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to	
91	If appropriate, provide any additional information/context	
31	to the answers in this section.	
	IT TRANSPARENCY	
9. PATIVIEN 92	Does the Entity adhere to the Wolfsberg Group Payment	
~_	Transparency Standards?	Yes

No #	Question	Answer
93	Does the Entity have policies, procedures and processes	Palonoi
	to comply with and have controls in place to ensure compliance with:	
93 a	FATF Recommendation 16	Yes
93 b	Local Regulations	Yes
93 b1	If Y, specify the regulation	162
93 01		EU Regulation 2015/847 - Italian law by decree n. 231/2007 as modified by Italian law by decree 90/2017
93 c	lf N, explain	
94	Does the Entity have controls to support the inclusion of required and accurate originator information in cross border payment messages?	Yes
95	Does the Entity have controls to support the inclusion of required beneficiary information cross-border payment messages?	Yes
95 a	If Y, does the Entity have procedures to include beneficiary address including country in cross border payments?	Yes
96	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
96 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
97	If appropriate, provide any additional information/context to the answers in this section.	
10. SANC	TIONS	
98	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
99	Does the Entity have policies, procedures, or other controls reasonably designed to prevent the use of another entity's accounts or services in a manner causing the other entity to violate sanctions prohibitions applicable to the other entity (including prohibitions within the other entity's local jurisdiction)?	Yes
100	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
101	Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists?	Yes
102	What is the method used by the Entity for sanctions screening?	Both Automated and Manual
102 a	If 'automated' or 'both automated and manual' selected:	
<u>102 a1</u> 102 a1a	Are internal system of vendor-sourced tools used? If a 'vendor-sourced tool' or 'both' selected, what is the name of the vendor/tool?	Both World-Check by Refinitiv
102 a2	When did you last test the effectiveness (of finding true matches) and completeness (lack of missing data) of the matching configuration of the automated tool? (If 'Other' please explain in Question 110)	< 1 year
103	Does the Entity screen all sanctions relevant data, including at a minimum, entity and location information, contained in cross border transactions against Sanctions Lists?	Yes
104 105	What is the method used by the Entity? Does the Entity have a data quality management programme to ensure that complete data for all	Combination of automated and manual Yes
400	transactions are subject to sanctions screening? Select the Sanctions Lists used by the Entity in its	
106		
106 106 a	sanctions screening processes: Consolidated United Nations Security Council Sanctions List (UN)	Used for screening customers and beneficial owners and for filtering transactional data

No #	Question	Answer
106 c	Office of Financial Sanctions Implementation HMT (OFSI)	Used for screening customers and beneficial owners (i.e. reference data)
106 d	European Union Consolidated List (EU)	Used for screening customers and beneficial owners and for filtering transactional data
106 e	Lists maintained by other G7 member countries	Used for screening customers and beneficial owners (i.e. reference data)
106 f	Other (specify)	
107	When regulatory authorities make updates to their Sanctions list, how many business days before the entity updates their active manual and/or automated screening systems against:	
107 a	Customer Data	Same day to 2 business days
107 b	Transactions	Same day to 2 business days
108	Does the Entity have a physical presence, e.g. branches, subsidiaries, or representative offices located in	No
109	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
109 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
110	If appropriate, provide any additional information/context to the answers in this section.	
11. TRAINII	NG & EDUCATION	
111	Does the Entity provide mandatory training, which includes:	
111 a	Identification and reporting of transactions to government authorities	Yes
111 b	Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered	Yes
111 c	Internal policies for controlling money laundering, terrorist financing and sanctions violations	Yes
111 d	New issues that occur in the market, e.g. significant regulatory actions or new regulations	Yes
111 e	Conduct and Culture	Yes
111 f	Fraud	Yes
112	Is the above mandatory training provided to :	
112 a	Board and Senior Committee Management	Yes
112 b		Yes
1140	1st Line of Defence	165
		Yes
112 c	2nd Line of Defence	Yes
112 c 112 d		
112 c 112 d 112 e	2nd Line of Defence 3rd Line of Defence Third parties to which specific FCC activities have been	Yes Yes Not Applicable
112 c 112 d 112 e 112 f	2nd Line of Defence 3rd Line of Defence Third parties to which specific FCC activities have been outsourced	Yes Yes
112 c 112 d 112 e 112 f 113	2nd Line of Defence 3rd Line of Defence Third parties to which specific FCC activities have been outsourced Non-employed workers (contractors/consultants) Does the Entity provide AML, CTF & Sanctions training that is targeted to specific roles, responsibilities and high risk products, services and activities? Does the Entity provide customised training for AML,	Yes Yes Not Applicable Not Applicable
112 c 112 d 112 d 112 e 112 f 113 114 114 a	2nd Line of Defence 3rd Line of Defence Third parties to which specific FCC activities have been outsourced Non-employed workers (contractors/consultants) Does the Entity provide AML, CTF & Sanctions training that is targeted to specific roles, responsibilities and high risk products, services and activities?	Yes Yes Not Applicable Yes Yes

No #	Question	Answer
115 a	If N, clarify which questions the difference/s relate to and	
	the branch/es that this applies to.	
116	If appropriate, provide any additional information/context	
	to the answers in this section.	
	ASSURANCE /COMPLIANCE TESTING	
117	Does the Entity have a program wide risk based Quality Assurance programme for financial crime (separate from	Vas
	the independent Audit function)?	
118	Does the Entity have a program wide risk based	
	Compliance Testing process (separate from the	Yes
	independent Audit function)?	
119	Confirm that all responses provided in the above Section	Yes
119 a	are representative of all the LE's branches If N, clarify which questions the difference/s relate to and	
119 a	the branch/es that this applies to.	
120	If appropriate, provide any additional information/context	
120	to the answers in this section.	
13. AUDIT		
121	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,	Yes
	Fraud and Sanctions policies and practices on a regular	
	basis?	
122	How often is the Entity audited on its AML, CTF, ABC,	
	Fraud and Sanctions programme by the following:	
122 a	Internal Audit Department	Component based reviews
122 b	External Third Party	Component based reviews
123	Does the internal audit function or other independent third party cover the following areas:	
123 a	AML, CTF, ABC, Fraud and Sanctions policy and	
120 0	procedures	Yes
123 b	Enterprise Wide Risk Assessment	Yes
123 c	Governance	Yes
123 d	KYC/CDD/EDD and underlying methodologies	Yes
123 e	Name Screening & List Management	Yes
123 f	Reporting/Metrics & Management Information	Yes
123 g	Suspicious Activity Filing Technology	Yes Yes
<u>123 h</u> 123 i	Transaction Monitoring	Yes
123 j	Transaction Screening including for sanctions	Yes
123 k	Training & Education	Yes
123	Other (specify)	
124	Are adverse findings from internal & external audit	
	tracked to completion and assessed for adequacy and	Yes
	completeness?	
125	Confirm that all responses provided in the above section	Yes
105 0	are representative of all the LE's branches If N, clarify which questions the difference/s relate to and	
125 a	the branch/es that this applies to.	
106	If appropriate, provide any additional information/tt	
126	If appropriate, provide any additional information/context to the answers in this section.	
	10 110 213WEIS III 1118 SECIUII.	
14. FRAUD		
127	Does the Entity have policies in place addressing fraud risk?	Yes
128	Does the Entity have a dedicated team responsible for	
.20	preventing & detecting fraud?	Yes

No #	Question	Answer		
129	Does the Entity have real time monitoring to detect fraud?	Yes		
130	Do the Entity's processes include gathering additional information to support its fraud controls, for example: IP address, GPS location, and/or device ID?	Yes		
131	Confirm that all responses provided in the above section are representative of all the LE's branches	Yes		
131 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.			
132	If appropriate, provide any additional information/context to the answers in this section.			
Declaratio	n Statement			
Wolfsberg Group Correspondent Banking Due Diligence Questionnaire 2023 (CBDDQ V1.4) Declaration Statement (To be signed by Global Head of Correspondent Banking or equivalent position holder AND Group Money Laundering Prevention Officer, Global Head of Anti- Money Laundering, Chief Compliance Officer, Global Head of Financial Crimes Compliance OR equivalent)				
Cassa Centrale Banca - Credito Cooperativo Italiano Spa (Financial Institution name) is fully committed to the fight against financial crime and makes every effort to remain in full compliance with all applicable financial crime laws, regulations and standards in all of the jurisdictions in which it does business and holds accounts.				
The Financial Institution understands the critical importance of having effective and sustainable controls to combat financial crime in order to protect its reputation and to meet its legal and regulatory obligations.				
The Financial Institution recognises the importance of transparency regarding parties to transactions in international payments and has adopted/is committed to adopting these standards.				
The Financial Institution further certifies it complies with / is working to comply with the Wolfsberg Correspondent Banking Principles and the Wolfsberg Trade Finance Principles. The information provided in this Wolfsberg CBDDQ will be kept current and will be updated no less frequently than every eighteen months.				
The Financial Institution commits to file accurate supplemental information on a timely basis.				
I, Sandro Rizzonelli (Global Head of Correspondent Banking or equivalent), certify that I have read and understood this declaration, that the answers provided in this Wolfsberg CBDDQ are complete and correct to my honest belief, and that I am authorised to execute this declaration on behalf of the Financial Institution.				
I, Marco Rago (MLRO or equivalent), certify that I have read and understood this declaration, that the answers provided in this Wolfsberg CBDDQ are complete and correct to my honest belief, and that I am authorised to execute this declaration on behalf of the Financial Institution.				
(Signature & Date)		te)		
	(Signature & Da	te)		