

## Anti-Money Laundering (AML) Questionnaire Banca Ifis SpA

The present AML Questionnaire contains the information required by the *Wolfsberg Group Correspondent Banking Due Diligence Questionnaire (CBDDQ)* V1.2, par. 1, 2, 3, 5, 6, 8, 10, 11 for the execution of the due diligence of Banca Ifis SpA.

### A. Entity Information

<b>Legal Name</b>	Banca IFIS Spa
<b>Full Address</b>	Via Terraglio, 63 – 30174 – Venezia-Mestre, Italy
<b>Head Office Address</b>	Via Gatta, 11 – 30174 – Venezia-Mestre, Italy
<b>SWIFT Code</b>	IFISIT2V
<b>GIIN Code</b>	RT72ES.99999.SL.380
<b>Tax ID</b>	02505630109
<b>Telephone and Telefax Number</b>	Telephone + 39 041 5027511 Telefax + 39 041 5027555
<b>Date of Incorporation</b>	5 <sup>th</sup> August 1983
<b>Banking License</b>	Nr. 5508, issued by Banca d'Italia, effective from 1 <sup>st</sup> January 2002
<b>Does the Entity operate under an Offshore Banking License?</b>	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
<b>Name of the Regulatory Body that oversees the Bank</b>	Banca d'Italia ( <a href="http://www.bancaditalia.it">www.bancaditalia.it</a> )
<b>Primary Business Lines</b>	Factoring, Leasing, Corporate Loans Non-Performing Loans acquisition and management Tax receivables purchase and management Retail and corporate bank accounts, deposits, medium-long term financing and funding instruments
<b>Website</b>	<a href="http://www.bancaifis.it">www.bancaifis.it</a> or <a href="http://www.bancaifis.it/en/">www.bancaifis.it/en/</a>
<b>ABI (Italian Banking Association) code</b>	03205
<b>Latest Annual Report</b>	Annual and Interim Reports are available on the institutional website <a href="http://www.bancaifis.it">www.bancaifis.it</a>

### B. Ownership Structure

<b>Is the Entity privately or publicly owned?</b>	Privately owned
<b>Main Shareholders (more than 25% shares)</b>	Full information on Shareholders: <a href="https://www.bancaifis.it/en/corporate-governance/ownership-structure/">https://www.bancaifis.it/en/corporate-governance/ownership-structure/</a> Other information is also available on Consob website ( <a href="http://www.consob.it">www.consob.it</a> ) or Borsa Italiana website ( <a href="http://www.borsaitaliana.it">www.borsaitaliana.it</a> )
<b>Shares (Stock Exchange)</b>	Banca IFIS shares are listed at the Italian Stock Exchange (Borsa Italiana)
<b>Board of Directors</b>	<b>Honorary Chairman:</b> Sebastien Egon FÜRSTENBERG <b>Chairman:</b> Ernesto FÜRSTENBERG FASSIO <b>CEO:</b> Frederik GEERTMAN <b>Directors:</b> Simona ARDUINI Monica BILLIO Roberta GOBBI Beatrice COLLEONI Roberto DIACETTI Luca LO GIUDICE Antonella MALINCONICO Paola PAOLONI Monica REGAZZI Giovanni MERUZZI <b>Co General Managers:</b> Raffaele ZINGONE Fabio LANZA
<b>Board of Statutory Auditors</b>	<b>Chairman:</b> Andrea BALELLI <b>Standing Auditors:</b> Franco OLIVETTI Annunziata MELACCIO <b>Substitutes:</b> Marinella MONTERUMISI Emanuela ROLLINO

**C. AML Programme, Policies, Practices, Procedures and Sanctions**

1. Is money laundering/terrorism financing considered in the Entity's country as a crime?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
2. Has the country in which the Entity is located established Laws/Regulations concerning AML/CFT/KYC? <i>Legislative Decree n. 231, November 21<sup>st</sup> 2007 as amended by Legislative Decree n. 125, October 4<sup>th</sup> 2019</i>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
3. Is the Entity subject to such Laws/Regulations?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
4. Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards? Does the AML programme require to be approved by the Entity's Board or senior committee thereof?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
5. Does the Entity have a legal and regulatory compliance program according to internal and international laws, rules and standards that includes a designated Officer that is responsible for coordinating and overseeing the AML programme?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
6. Has the Entity developed written policies documenting the processes that they have in place to prevent, detect and report suspicious transactions that have been approved, by Senior Management?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
7. Does the Entity use third parties to carry out any components of its AML, CTF and Sanctions programme?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
8. In addition to inspections by the government, supervisors-regulators, does the Entity have an internal audit function or other independent third party that assesses AML policies and practices on a regular basis?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
9. Does the Entity have policies and procedures that:	
a. Prohibit the opening and keeping of anonymous and fictitious named accounts?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
b. Prohibit the opening and keeping of accounts for unlicensed banks?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
c. Prohibit dealing with other entities that provide banking services to unlicensed banks?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
d. Prohibit accounts / relationships with shell banks and dealing with another Entity that provides services to shell banks?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
e. Cover relationships with politically exposed persons (PEP's), their family and close associates?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
f. Outline the processes regarding screening for sanctions, PEPs and negative media?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
g. Define escalation processes for financial crime risk issues?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
h. Specify how potentially suspicious activity identified by employees is to be escalated and investigated?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
10. Does the Entity have appropriate record retention procedures pursuant to applicable law? (10 years retention period)	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
11. Does the Entity require that its AML policies and practices be applied to all branches and subsidiaries both in the home country and abroad?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>



**D. Risk Assessment**

12. Does the Entity have a risk focused assessment of its customer base and transactions of its customers?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
13. Does the Entity determine the appropriate level of enhanced due diligence necessary for those categories of customers and transactions that the Entity has reason to believe pose a heightened risk of illicit activities at or through the Entity?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>

**E. Know Your Customer, Customer Due Diligence and Enhanced Due Diligence**

14. Has the Entity implemented processes for the identification of its customers, including customer information (for example: name, nationality, street address, telephone number, occupation, age/date of birth, number and type of valid official identification, as well as the name of the country/state that issued it, ownership structure, expected activity, nature of business/employment, product usage, purpose and nature of relationship, source of funds)?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
15. Do the Entity's policies and procedures set out when CDD must be completed, e.g. at the time of onboarding or within 30 days?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
16. Does the Entity have a requirement to collect information regarding its customers' business activities?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
17. Does the Entity have a process including an analysis related to customers' beneficial owners (ultimate shareholders), authorised signatories, key controllers, other relevant parties?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
18. Does the Entity assess its Entity customers' AML policies or practices?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
19. Does the Entity have a process to review and, where appropriate, update customer information relating to high risk client information, adverse information screening and suspicious activity reporting?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
20. Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
21. Does the Entity have policies, procedures and processes to review and escalate potential matches from screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
22. Does the Entity have a process to review and update customer information based on KYC renewal, trigger event?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
23. Does the due diligence process result in customers receiving a risk classification?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
24. Does the Entity have procedures to establish a record for each new customer noting their respective ID documents and 'Know Your Customer' information?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
25. Does the Entity complete a risk-based assessment to understand the normal and expected transactions of its customers?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>

**F. Transaction Monitoring and Reporting**

26. Does the Entity have risk based policies or practices for the identification and reporting of transactions and suspicious activity that are required to be reported to the authorities?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
27. Does the Entity have a method to monitor transactions for suspicious activities? (a combination of automated and manual)	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
28. Does the Entity screen customers and transactions against lists of persons, entities or countries issued by government/competent authorities?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>

29. Does the Entity have a monitoring program for unusual and potentially suspicious activity (i.e. funds transfers and monetary instruments)?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
30. Does the Entity have regulatory requirements to report currency transactions and policies, procedures and processes to comply with?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
31. Is the Entity obliged to report suspicious transactions to government authorities?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>

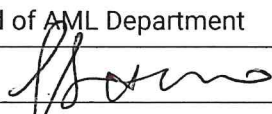
#### G. Sanctions

32. 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 <input checked="" type="checkbox"/> No <input type="checkbox"/>
33. Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
34. Does the Entity have a physical presence, e.g., branches, subsidiaries, or representative offices located in countries / regions against which UN, OFAC, OFSI, EU and G7 member countries have enacted comprehensive jurisdiction-based Sanctions?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>

#### H. AML Training

35. Does the Entity provide AML mandatory training to relevant employees and agents which includes identification and reporting of transactions that must be reported to government authorities, examples of different forms of money laundering, terrorist financing and sanctions violations involving the Entity's products and services and internal policies to prevent money laundering?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
36. Does the Entity retain records of its training sessions including attendance records and relevant training materials used?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
37. Does the Entity have policies to communicate new AML related laws or changes to existing AML related policies or practices to relevant employees?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
38. Does the Entity employ agents to carry out some of its functions?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
39. Is the above mandatory training provided to: Board and Senior Committee Management, 1st Line of Defence, 2nd Line of Defence, 3rd Line of Defence, 3rd parties to which specific FCC activities have been outsourced, Non-employed workers (contractors/consultants)?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>

I confirm that the above information is current, accurate and reflective of Banca IFIS Spa Anti-Money Laundering (AML), Counter Terrorism Financing (CTF) and Sanctions policies.

<b>Name</b>	Giovanna BAZZARO
<b>Title</b>	Head of AML Department
<b>Signature</b>	
<b>Date</b>	22 <sup>th</sup> December 2022