the Wolfsberg Group

Financial Institution Name: Location (Country) :

IMPREBANCA S.P.A.

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 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 base etc.) is materially different than its Entity Head Office, a separate questionnaire can be completed for that branch.

No#	Question	Answer
	& OWNERSHIP	
1	Full Legal Name	IMPREBANCA S.P.A.
		INFREDANCA S.F.A.
2	Append a list of foreign branches which are covered	NO
-	by this questionnaire	NO
3	Full Legal (Registered) Address	
3	Full Legal (Registered) Address	VIA COLA DI RIENZO, 240
4	Full Driver on Duning and Address (if different from	
4	Full Primary Business Address (if different from above)	
	above)	
5	Date of Entity incorporation/establishment	08/05/2008
6	Select type of ownership and append an ownership	
	chart if available	
6 a	Publicly Traded (25% of shares publicly traded)	No 🔽
6 a1	If Y, indicate the exchange traded on 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	BANCA FINNAT EURAMERICA S.P.A.
		GENERALI ITALIA S.P.A.
7	% of the Entity's total shares composed of bearer	
l.	shares	0
8	Does the Entity, or any of its branches, operate under	
l°	an Offshore Banking License (OBL)?	No ▼
8 a	If Y, provide the name of the relevant branch/es	
o a	which operate under an OBL	
	which operate under an OBE	
9	Does the Bank have a Virtual Bank License or	No 🔻
<u></u>	provide services only through online channels?	
10	Name of primary financial regulator/supervisory	Bank of Italy, Consob
	authority	
11	Provide Legal Entity Identifier (LEI) if available	8156005300C1AFD13828
12	Provide the full legal name of the ultimate parent (if	Not applicable
	different from the Entity completing the DDQ)	
		1

ultimate parent 14. Salect the business areas applicable to the Entity 14. Rotal Banking 14. Rotal Banking 15. No 15. Commercial Banking 16. Commercial Banking 17. Yes 17. And I was a supplicable to the Entity 18. Rotal Banking 19. No 19. The Commercial Banking 19. No 19. The Investment Banking 19. Other (please explain) 19. Date the Entity have a significant (10% or more) portfolio of non-resident customers or does it derive wore than 10% of list recountered where the non-resident customers or provided in the Investment Banking or non-resident customers or does it derive wore than 10% of list recountered where the non-resident customers are located. 19. Salect the classet value: 19. Salect the classet value: 19. Confirm that all responses provided in the above Section are representable of all the LES banches Section sections the difference feeled to banches Section are representable of all the LES banches Section sections the section of the Section Section Section Section Section Section Section Secti	13	Jurisdiction of licensing authority and regulator of	In
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Near Section Section Near N			
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14 d			
14 de Transactional Banking Ves			
Investment Banking		, and the second	
14 Financial Markets Trading Yes		<u> </u>	
14 g		-	
14 i Mislateral Development Bank No 14 i Weelth Management No 15 Does the Entity have a significant (10% or more) portfolio of non-resident customers or does it derive		<u> </u>	
Multilaterial Development Bank No	_	,	Yes
Wealth Management	14 h	Broker/Dealer	No 🔽
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foreign banks?	19411		<u></u>
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19 a1g Does the Entity offer Correspondent Banking		9	
	19 a1g	Does the Entity offer Correspondent Banking	
services to regulated Money Services Businesses Please select			Please select
(MSBs)/Money Value Transfer Services (MVTSs)?		(MSBs)/Money Value Transfer Services (MVTSs)?	
19 a1h Does the Entity allow downstream relationships	19 a1h	Does the Entity allow downstream relationships	
		with MSBs, MVTSs, or Payment Service Provider	
		(PSPs)?	
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19 a1i	Does the Entity have processes and procedures in place to identify downstream relationships with	Please select	
	MSBs /MVTSs/PSPs?		
19 b	Cross-Border Bulk Cash Delivery	Please select	
19 с	Cross-Border Remittances	Please select	
19 d	Domestic Bulk Cash Delivery	Please select	
19 e	Hold Mail	Please select	
19 f	International Cash Letter	Please select	
19 g	Low Price Securities	Please select	
19 h	Payable Through Accounts	Please select	
19 i	Payment services to non-bank entities who may then offer third party payment services to their customers?	Please select	
19 i1	If Y , please select all that apply below?		
19 i2	Third Party Payment Service Providers	Please select	
19 i3	Virtual Asset Service Providers (VASPs)	Please select	
19 i4	eCommerce Platforms	Please select	
19 i5	Other - Please explain		
19 j	Private Banking	Please select	
19 k	Remote Deposit Capture (RDC)	Please select	
19 I	Sponsoring Private ATMs	Please select	
19 m	Stored Value Instruments	Please select	
19 n	Trade Finance	Please select	
19 о	Virtual Assets	Please select	
19 p	For each of the following please state whether you offer the service to walk-in customers and if so, the applicable level of due diligence:		
19 p1	Check cashing service	Please select	_
19 p1a	If yes, state the applicable level of due diligence	Please select	
19 p2	Wire transfers	Please select	
19 p2a	If yes, state the applicable level of due diligence	Please select	
19 p3	Foreign currency conversion	Please select	
19 p3a	If yes, state the applicable level of due diligence	Please select	
19 p4	Sale of Monetary Instruments	Please select	
19 p4 19 p4a	Sale of Monetary Instruments If yes, state the applicable level of due diligence		
19 p4	Sale of Monetary Instruments	Please select	
19 p4 19 p4a	Sale of Monetary Instruments If yes, state the applicable level of due diligence If you offer other services to walk-in customers please provide more detail here, including	Please select	
19 p4 19 p4a 19 p5	Sale of Monetary Instruments If yes, state the applicable level of due diligence If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by	Please select	<u> </u>
19 p4 19 p4a 19 p5	Sale of Monetary Instruments If yes, state the applicable level of due diligence If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) Confirm that all responses provided in the above	Please select Please select	▼
19 p4 19 p4a 19 p5 19 p5	Sale of Monetary Instruments If yes, state the applicable level of due diligence If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to	Please select Please select	▼
19 p4 19 p4a 19 p5 19 p5 20 20 a	Sale of Monetary Instruments If yes, state the applicable level of due diligence If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section,	Please select Please select	▼
19 p4 19 p4a 19 p5 19 p5 20 20 a	Sale of Monetary Instruments If yes, state the applicable level of due diligence If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. TF & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the	Please select Please select	<u></u>
19 p4 19 p4a 19 p5 19 q 20 20 a 21 3. AML, C	Sale of Monetary Instruments If yes, state the applicable level of due diligence If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. TF & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:	Please select Please select Yes	T
19 p4 19 p4a 19 p5 19 q 20 20 a 21 3. AML, C 22	Sale of Monetary Instruments If yes, state the applicable level of due diligence If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. TF & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient	Please select Please select Yes Yes	1
19 p4 19 p4a 19 p5 19 q 20 20 a 21 3. AML, C 22 22 a 22 b	Sale of Monetary Instruments If yes, state the applicable level of due diligence If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. TF & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient Adverse Information Screening	Please select Please select Yes Yes Yes Yes	
19 p4 19 p4a 19 p5 19 q 20 20 a 21 3. AML, C 22 22 a 22 b 22 c	Sale of Monetary Instruments If yes, state the applicable level of due diligence If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. TF & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient Adverse Information Screening Beneficial Ownership	Please select Please select Yes Yes Yes Yes Yes Yes	
19 p4 19 p4a 19 p5 19 q 20 20 a 21 3. AML, C 22 22 a 22 b 22 c 22 d	Sale of Monetary Instruments If yes, state the applicable level of due diligence If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. TF & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient Adverse Information Screening Beneficial Ownership Cash Reporting	Please select Please select Yes Yes Yes Yes Yes Yes	
19 p4 19 p4a 19 p5 19 q 20 20 a 21 3. AML, C 22 a 22 b 22 c 22 d 22 e	Sale of Monetary Instruments If yes, state the applicable level of due diligence If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section, TF & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient Adverse Information Screening Beneficial Ownership Cash Reporting CDD	Please select Please select Yes Yes Yes Yes Yes Yes Yes Ye	
19 p4 19 p4a 19 p5 19 q 20 20 a 21 3. AML, C 22 22 b 22 c 22 d 22 e 22 f	Sale of Monetary Instruments If yes, state the applicable level of due diligence If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. TF & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD	Please select Please select Yes Yes Yes Yes Yes Yes Yes Ye	
19 p4 19 p4a 19 p5 19 q 20 20 a 21 3. AML, C 22 22 a 22 b 22 c 22 c 22 c 22 g	Sale of Monetary Instruments If yes, state the applicable level of due diligence If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. TF & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing	Please select Please select Yes Yes Yes Yes Yes Yes Yes Ye	
19 p4 19 p4a 19 p5 19 p5 20 20 a 21 3. AML, C 22 22 b 22 c 22 c 22 c 22 g 22 h	Sale of Monetary Instruments If yes, state the applicable level of due diligence If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. TF & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing Periodic Review	Please select Please select Yes Yes Yes Yes Yes Yes Yes Ye	
19 p4 19 p4a 19 p5 19 p5 20 20 a 21 3. AML, C 22 22 b 22 c 22 c 22 d 22 c 22 f 22 g 22 h 22 i	Sale of Monetary Instruments If yes, state the applicable level of due diligence If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. TF & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient Adverse Information Screening Beneficial Ownership Cash Reporting CDD Independent Testing Periodic Review Policies and Procedures	Please select Please select Yes Yes Yes Yes Yes Yes Yes Ye	
19 p4 19 p4a 19 p5 19 p5 20 20 a 21 22 a 22 b 22 c 22 d 22 c 22 g 22 g 22 h 22 i 22 j	Sale of Monetary Instruments If yes, state the applicable level of due diligence If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. TF & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing Periodic Review Policies and Procedures PEP Screening	Please select Please select Yes Yes Yes Yes Yes Yes Yes Ye	
19 p4 19 p4a 19 p5 19 q 20 20 a 21 3. AML, C 22 22 a 22 b 22 c 22 d 22 c 22 f 22 g 22 h 22 i	Sale of Monetary Instruments If yes, state the applicable level of due diligence If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. TF & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient Adverse Information Screening Beneficial Ownership Cash Reporting CDD Independent Testing Periodic Review Policies and Procedures	Please select Please select Yes Yes Yes Yes Yes Yes Yes Ye	

22 m	Suspicious Activity Reporting	Yes	
22 n	Training and Education	Yes	Ŧ
22 o	Transaction Monitoring	Yes	三
23	How many full time employees are in the Entity's AML, CTF & Sanctions Compliance Department?	1-10	-
24	Is the Entity's AML, CTF & Sanctions policy approved at least annually by the Board or equivalent Senior Management Committee? If N, describe your practice in Question 29.	Yes	•
25	Does the Board receive, assess, and challenge regular reporting on the status of the AML, CTF, & Sanctions programme?	Yes	•
26	Does the Entity use third parties to carry out any components of its AML, CTF & Sanctions programme?	Yes	•
26 a	If Y, provide further details	OUR FINANCHIAL ISTITUTIONHAS OUTSOURCED THE IT FUNCITIONS TO A CONSORTI WHICH SERVICES A LARGE NUMBER OF F.I.	UM
27	Does the entity have a whistleblower policy?	Yes	
28	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes	
28 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.		
29	If appropriate, provide any additional information/context to the answers in this section.		
4. ANTI	BRIBERY & CORRUPTION		
30	Has the Entity documented policies and procedures consistent with applicable ABC regulations and requirements to reasonably prevent, detect and report bribery and corruption?	Yes	•
31	Does the Entity have an enterprise wide programme that sets minimum ABC standards?	Yes	
32	Has the Entity appointed a designated officer or officers with sufficient experience/expertise responsible for coordinating the ABC programme?	Yes	•
33	Does the Entity have adequate staff with appropriate levels of experience/expertise to implement the ABC programme?	Yes	
34	Is the Entity's ABC programme applicable to:	Not Applicable	
35	Does the Entity have a global ABC policy that:	The state of the s	
35 a	Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage.	Yes	•
35 b	Includes enhanced requirements regarding interaction with public officials?	Yes	
35 с	Includes a prohibition against the falsification of books and records (this may be within the ABC policy or any other policy applicable to the Legal Entity)?	Yes	V
36	Does the Entity have controls in place to monitor the effectiveness of their ABC programme?	Yes	~
37	Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme?	Yes	-
38	Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months?	Yes	~
38 a	If N, provide the date when the last ABC EWRA was completed.		
39	Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment?	No	•
40	Does the Entity's ABC EWRA cover the inherent risk components detailed below:	Yes	~
40 a	Potential liability created by intermediaries and other third-party providers as appropriate	Yes	V

40 b	Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries	Yes
40 с	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 contributions	Yes
40 e	Changes in business activities that may materially increase the Entity's corruption risk	Yes
41	Does the Entity's internal audit function or other independent third party cover ABC Policies and Procedures?	Yes
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.	
5. AML. C	CTF & SANCTIONS POLICIES & PROCEDURES	
46	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent,	
	detect and report:	
46 a	Money laundering	Yes
46 b	Terrorist financing	Yes
46 c 47	Sanctions violations Are the Entity's policies and procedures updated at	Yes Yes
48	least annually? Has the Entity chosen to compare its policies and	
40.5	procedures against:	At.
48 a	U.S. Standards	No
48 a1 48 b	If Y, does the Entity retain a record of the results? EU Standards	Please select Yes
48 b1	If Y, does the Entity retain a record of the results?	Yes
49	Does the Entity have policies and procedures that:	160
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 с	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
		I .
49 f	Prohibit opening and keeping of accounts for	Yes
49 f 49 g 49 h		Yes

49 i	Define the process for escalating financial crime risk issues/potentially suspicious activity identified by employees	Yes
49 j	Define the process, where appropriate, for terminating existing customer relationships due to financial crime risk	Yes
49 k	Define the process for exiting clients for financial crime reasons that applies across the entity, including foreign branches and affiliates	Yes
491	Define the process and controls to identify and handle customers that were previously exited for financial crime reasons if they seek to re-establish a relationship	No
49 m	Outline the processes regarding screening for sanctions, PEPs and Adverse Media/Negative News	Yes
49 n	Outline the processes for the maintenance of internal "watchlists"	Yes
50	Has the Entity defined a risk tolerance statement or similar document which defines a risk boundary around their business?	Yes
51	Does the Entity have record retention procedures that comply with applicable laws?	Yes
51 a	If Y, what is the retention period?	5 years or more
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 the branch/es that this applies to.	
53	If appropriate, provide any additional information/context to the answers in this section.	
6 AML CT	F & SANCTIONS RISK ASSESSMENT	•
6. AML, CT 54	F & 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	Yes
54	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:	Yes Yes
54 a 54 b 54 c	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client	
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 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 55 d 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 effectiveness components detailed below: Transaction Monitoring	Yes Yes Yes Yes
54 a 54 b 54 c 54 d 55 d 55 a 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 effectiveness components detailed below: Transaction Monitoring Customer Due Diligence	Yes Yes Yes Yes Yes
54 a 54 b 54 c 54 d 55 d 55 d 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 a 54 b 54 c 54 d 55 d 55 a 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 effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative	Yes Yes Yes Yes Yes
54 a 54 b 54 c 55 d 55 c 55 d 55 e	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
54 a 54 b 54 c 55 d 55 b 55 c 55 d 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
54 a 54 a 54 b 54 c 54 d 55 a 55 a 55 b 55 c 55 d 55 e	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
54 a 54 b 54 c 55 d 55 b 55 c 55 d 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
54 a 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 d 55 c 55 f 55 g 55 h	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	Yes
54 a 54 a 54 b 54 c 54 c 55 a 55 a 55 b 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 was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below:	Yes
54 a 54 a 54 b 54 c 54 c 55 a 55 a 55 b 55 c 55 d 55 c 55 f 55 g 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 a 54 a 54 b 54 c 54 c 55 a 55 a 55 b 55 c 55 d 55 c 55 f 55 c 55 f 55 7 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 Product	Yes
54 a 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 d 55 c 55 f 55 g 55 h 56 56 a 57	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 No No No No No No
54 a 54 b 54 c 54 d 55 c 55 a 55 b 55 c 55 d 55 c 55 d 55 e 55 f 56 a 57 a 57 a 57 b 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 No No
54 a 54 b 54 c 54 d 55 c 55 a 55 b 55 c 55 d 55 c 55 d 55 e 556 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 No No No No No No No No
54 a 54 a 54 b 54 c 54 d 55 c 55 a 55 b 55 c 55 d 55 c 55 f 55 g 55 h 56 57 a 57 a 57 c 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: Customer Due Diligence	Yes No No No No Yes
54 a 54 a 54 b 54 c 54 c 54 d 55 55 a 55 b 55 c 55 d 55 c 55 f 55 g 55 h 56 57 a 57 a 57 a 57 c 57 d 58 58 a 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 No No No Yes Yes Yes Yes
54 a 54 a 54 b 54 c 54 d 55 c 55 a 55 b 55 c 55 d 55 c 55 f 55 g 55 h 56 57 a 57 a 57 c 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: Customer Due Diligence	Yes No No No No Yes

58 e	Name Screening	Yes
58 f	Transaction Screening	Yes
58 g	Training and Education	
_		Yes
59	Has the Entity's Sanctions EWRA been completed in	Yes
<u></u>	the last 12 months?	
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	
00 a	and the branch/es that this applies to.	
	and the branchies that this applies to.	
61	If appropriate, provide any additional	
	information/context to the answers in this section.	
	Information/context to the answers in this section.	
7 1000 00	D I EDD	
	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	Yes
	onboarding or within 30 days?	
64	·	
64	Which of the following does the Entity gather and	
	retain when conducting CDD? Select all that apply:	
64 a	Customer identification	Yes
64 b	Expected activity	Yes
64 c	Nature of business/employment	Yes
	1 2	
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	Key controllers	
	-	Yes
65 d	Other relevant parties	Yes
66	What is the Entity's minimum (lowest) threshold	25%
	applied to beneficial ownership identification?	LO /0
67	Does the due diligence process result in customers	
	receiving a risk classification?	Yes
67 a		
0' 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	Geography	Yes
67 a3	Business Type/Industry	Yes
67 a4	Legal Entity type	Yes
67 a5	Adverse Information	Yes
67 a6	Other (specify)	
	I	
•	l .	
68	For high risk non-individual customers, is a site visit a	No.
68	For high risk non-individual customers, is a site visit a part of your KYC process?	No
68 68 a		No
68 a	part of your KYC process? If Y, is this at:	
68 a 68 a1	part of your KYC process? If Y, is this at: Onboarding	Yes
68 a 68 a1 68 a2	part of your KYC process? If Y, is this at: Onboarding KYC renewal	Yes Yes
68 a 68 a1 68 a2 68 a3	part of your KYC process? If Y, is this at: Onboarding KYC renewal Trigger event	Yes
68 a 68 a1 68 a2	part of your KYC process? If Y, is this at: Onboarding KYC renewal	Yes Yes
68 a 68 a1 68 a2 68 a3	part of your KYC process? If Y, is this at: Onboarding KYC renewal Trigger event	Yes Yes Yes
68 a 68 a1 68 a2 68 a3 68 a4	part of your KYC process? If Y, is this at: Onboarding KYC renewal Trigger event Other	Yes Yes Yes
68 a 68 a1 68 a2 68 a3 68 a4	part of your KYC process? If Y, is this at: Onboarding KYC renewal Trigger event Other	Yes Yes Yes
68 a 68 a1 68 a2 68 a3 68 a4	part of your KYC process? If Y, is this at: Onboarding KYC renewal Trigger event Other	Yes Yes Yes
68 a 68 a1 68 a2 68 a3 68 a4	part of your KYC process? If Y, is this at: Onboarding KYC renewal Trigger event Other	Yes Yes Yes
68 a 68 a1 68 a2 68 a3 68 a4	part of your KYC process? If Y, is this at: Onboarding KYC renewal Trigger event Other If yes, please specify "Other"	Yes Yes Yes
68 a 68 a1 68 a2 68 a3 68 a4 68 a4a	part of your KYC process? If Y, is this at: Onboarding KYC renewal Trigger event Other If yes, please specify "Other" Does the Entity have a risk based approach to	Yes Yes Yes No
68 a 68 a1 68 a2 68 a3 68 a4 68 a4a	part of your KYC process? If Y, is this at: Onboarding KYC renewal Trigger event Other If yes, please specify "Other" Does the Entity have a risk based approach to screening customers for Adverse Media/Negative	Yes Yes Yes
68 a 68 a1 68 a2 68 a3 68 a4 68 a4a	part of your KYC process? If Y, is this at: Onboarding KYC renewal Trigger event Other If yes, please specify "Other" Does the Entity have a risk based approach to screening customers for Adverse Media/Negative News?	Yes Yes Yes No
68 a 68 a1 68 a2 68 a3 68 a4 68 a4a	part of your KYC process? If Y, is this at: Onboarding KYC renewal Trigger event Other If yes, please specify "Other" Does the Entity have a risk based approach to screening customers for Adverse Media/Negative	Yes Yes Yes No
68 a 68 a1 68 a2 68 a3 68 a4 68 a4a	part of your KYC process? If Y, is this at: Onboarding KYC renewal Trigger event Other If yes, please specify "Other" Does the Entity have a risk based approach to screening customers for Adverse Media/Negative News?	Yes Yes Yes No
68 a 68 a1 68 a2 68 a3 68 a4 68 a4a 69	part of your KYC process? If Y, is this at: Onboarding KYC renewal Trigger event Other If yes, please specify "Other" Does the Entity have a risk based approach to screening customers for Adverse Media/Negative News? If Y, is this at:	Yes Yes Yes No

69 a3	Triggor ovent	Von
69 a3	Trigger event	Yes
	What is the method used by the Entity to screen for Adverse Media/Negative News?	Combination of automated and manual
71	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
71 a	If Y, is this at:	
71 a1	Onboarding	Yes
71 a2	KYC renewal	Yes
71 a3	Trigger event	Yes
72	What is the method used by the Entity to screen PEPs?	Combination of automated and manual
73	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
74	Is KYC renewed at defined frequencies based on risk rating (Periodic Reviews)?	Yes
74 a	If yes, select all that apply:	
74 a1	Less than one year	Yes
74 a2	1 – 2 years	Yes
74 a3	3 – 4 years	Yes
74 a4	5 years or more	Yes
74 a5 74 a6	Trigger-based or perpetual monitoring reviews	Yes
75	Other (Please specify) Does the Entity maintain and report metrics on current and past periodic or trigger event due diligence	Voo
76	reviews?	Yes
70	From the list below, which categories of customers or industries are subject to EDD and/or are restricted, or prohibited by the Entity's FCC programme?	
76 a	Arms, defence, military	Do not have this category of customer or industry
76 b	Respondent Banks	Do not have this category of customer or industry
76 b1	If EDD or restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022?	Yes
76 c	Embassies/Consulates	Do not have this category of customer or industry
76 d	Extractive industries	EDD on risk-based approach
76 e	Gambling customers	EDD on risk-based approach
76 f	General Trading Companies	EDD on risk-based approach
76 g	Marijuana-related Entities	Do not have this category of customer or industry
76 h	MSB/MVTS customers	Do not have this category of customer or industry
76 i	Non-account customers	EDD on risk-based approach
76 j	Non-Government Organisations	Do not have this category of customer or industry
76 k	Non-resident customers	EDD on risk-based approach
76 I	Nuclear power	Do not have this category of customer or industry
76 m	Payment Service Providers	EDD on risk-based approach
76 n	PEPs	EDD on risk-based approach
76 o	PEP Close Associates	EDD on risk-based approach
76 p	PEP Related	EDD on risk-based approach
76 q	Precious metals and stones	EDD on risk-based approach
76 r	Red light businesses/Adult entertainment	EDD on risk-based approach
76 s	Regulated charities	EDD on risk-based approach
76 t	Shell banks	EDD on risk-based approach
76 u	Travel and Tour Companies	EDD on risk-based approach
76 v	Unregulated charities	EDD on risk-based approach
76 w	Used Car Dealers	EDD on risk-based approach
76 w	Virtual Asset Service Providers	
76 y	Other (specify)	Do not have this category of customer or industry
77	If restricted, provide details of the restriction	70t and 70I-For this category clients are subject to EDD/CDD measures
78	Does EDD require senior business management and/ or compliance approval?	Yes

78 a	If V indicate who provides the engravely	Conjor business management
76 a 79	If Y indicate who provides the approval:	Senior business management
79	Does the Entity have specific procedures for onboarding entities that handle client money such as lawyers, accountants, consultants, real estate agents?	No
80	Does the Entity perform an additional control or quality review on clients subject to EDD?	Yes
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	DRING & REPORTING	
83	Does the Entity have risk based policies, procedures and monitoring processes for the identification and reporting of suspicious activity?	Yes
84	What is the method used by the Entity to monitor transactions for suspicious activities?	Combination of automated and manual
84 a	If manual or combination selected, specify what type of transactions are monitored manually	RECURRING MONTHLY CHECKS
84 b	If automated or combination selected, are internal system or vendor-sourced tools used?	Both
84 b1	If 'Vendor-sourced tool' or 'Both' selected, what is the name of the vendor/tool?	NETECH WEBEVALUATION
84 b2	When was the tool last updated?	1-2 years
84 b3	When was the automated Transaction Monitoring application last calibrated?	1-2 years
85	Does the Entity have regulatory requirements to report suspicious transactions?	Yes
85 a	If Y, does the Entity have policies, procedures and processes to comply with suspicious transaction reporting requirements?	Yes
86	Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity?	Yes
87	Does the Entity have a data quality management programme to ensure that complete data for all transactions are subject to monitoring?	Yes
88	Does the Entity have processes in place to respond to Request For Information (RFIs) from other entities in a timely manner?	No
89	Does the Entity have processes in place to send Requests for Information (RFIs) to their customers in a timely manner?	Yes
90	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
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 to the answers in this section.	
9. PAYME	I NT TRANSPARENCY	
92	Does the Entity adhere to the Wolfsberg Group	
	Payment Transparency Standards?	Yes

-	In a section of	
93	Does the Entity have policies, procedures and processes 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	Italian Decree law 231/2007 and updates
93 с	If 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	
102 a	screening?	Both Automated and Manual
102 a	screening? If 'automated' or 'both automated and manual' selected:	Both Automated and Manual
102 a1	If 'automated' or 'both automated and manual' selected: Are internal system of vendor-sourced tools used?	Both Automated and Manual Vendor-sourced tools
	If 'automated' or 'both automated and manual' selected:	
102 a1 102 a1a 102 a2	If 'automated' or 'both automated and manual' selected: Are internal system of vendor-sourced tools used? If a 'vendor-sourced tool' or 'both' selected, what	Vendor-sourced tools
102 a1 102 a1a	If 'automated' or 'both automated and manual' selected: Are internal system of vendor-sourced tools used? If a 'vendor-sourced tool' or 'both' selected, what is the name of the vendor/tool? 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	Vendor-sourced tools REFINITIV - LSEG

		,
105	Does the Entity have a data quality management programme to ensure that complete data for all transactions are subject to sanctions screening?	Yes
106	Select the Sanctions Lists used by the Entity in its sanctions screening processes:	
106 a	Consolidated United Nations Security Council Sanctions List (UN)	Used for screening customers and beneficial owners and for filtering transactional data
106 b	United States Department of the Treasury's Office of Foreign Assets Control (OFAC)	Used for screening customers and beneficial owners and for filtering transactional data
106 с	Office of Financial Sanctions Implementation HMT (OFSI)	Not used
106 d	European Union Consolidated List (EU)	Used for screening customers and beneficial owners and for filtering transactional data
106 е	Lists maintained by other G7 member countries	Not used
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 countries/regions against which UN, OFAC, OFSI, EU or G7 member countries have enacted comprehensive jurisdiction-based Sanctions?	No
109	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
109 а	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 TRAINI	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	1st Line of Defence	Yes
112 c	2nd Line of Defence	Yes
112 d 112 e	3rd Line of Defence Third parties to which specific FCC activities have	Yes Not Applicable
110	been outsourced	
112 f	Non-employed workers (contractors/consultants)	Not applicable
113	Does the Entity provide AML, CTF & Sanctions training that is targeted to specific roles, responsibilities and high-risk products, services and activities?	Yes
114	Does the Entity provide customised training for AML, CTF and Sanctions staff?	Yes
114 a	If Y, how frequently is training delivered?	Annually
115	Confirm that all responses provided in the above	Yes
	Section are representative of all the LE's branches	

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.	
12 QUALITY	/ ASSURANCE /COMPLIANCE TESTING	
117	Does the Entity have a program wide risk based	
	Quality Assurance programme for financial crime (separate from the independent Audit function)?	Yes
118	Does the Entity have a program wide risk based Compliance Testing process (separate from the independent Audit function)?	Yes
119	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
119 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
120	If appropriate, provide any additional information/context to the answers in this section.	
13. AUDIT	<u> </u>	
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, Fraud and Sanctions policies and practices on a regular basis?	Yes
122	How often is the Entity audited on its AML, CTF, ABC, Fraud and Sanctions programme by the following:	
122 a	Internal Audit Department	18 months
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 procedures	Yes
123 b 123 c	Enterprise Wide Risk Assessment Governance	Yes
123 d	KYC/CDD/EDD and underlying methodologies	Yes Yes
123 u	Name Screening & List Management	Yes
123 f	Reporting/Metrics & Management Information	Yes
123 g	Suspicious Activity Filing	Yes
123 h	Technology	Yes
123 i	Transaction Monitoring	Yes
123 j	Transaction Screening including for sanctions	No
123 k	Training & Education	Yes
123 I	Other (specify)	
124	Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness?	Yes
125	Confirm that all responses provided in the above section are representative of all the LE's branches	Yes
125 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
126	If appropriate, provide any additional information/context to the answers in this section.	
14. FRAUE		
127	Does the Entity have policies in place addressing fraud risk?	Yes
128	Does the Entity have a dedicated team responsible for preventing & detecting fraud?	Yes
-		

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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.	
Declaration 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) imprebanca 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 Financ	ial Institution commits to file accurate supplemental information or	n a timely basis.
I, Spallanzani Antonio (Global Head of Correspondent Banking or equivalent), certify that I have read and understood this declaration, that		
the answers Institution.	s 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
I, Farina : Wolfsberg ((WETCO OF EQU	ivalent), certify that I have read and understood this declaration, that the answers provided in this am authorised to execute this declaration on behalf of the Financial Institution.
	(Signature & Dal	te)
	(Signature & Dat	te)
I		