the Wolfsberg Group

Financial Institution Name:

BANCA CONSULIA S.P.A.

MILANO

MILANO

No#	Question	Answer
1. EN	TITY & OWNERSHIP	
1	Full Legal Name	BANCA CONSULIA S.P.A.
2	Append a list of branches which are covered by this questionnaire	N.A.
3	Full Legal (Registered) Address	Corso Monforte, 52, 20122 Milano MI
4	Full Primary Business Address (if different from above)	
5	Date of Entity incorporation / establishment	13/09/1999
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	84,57% CAPITAL SHUTTLE S.P.A. (Shareholders);
7	% of the Entity's total shares composed of bearer shares	No bearer shares
8	Does the Entity, or any of its branches, operate under an Offshore Banking License (OBL)?	No
8 a	If Y, provide the name of the relevant branch/es which operate under an OBL	

2. AMI	L, CTF & SANCTIONS PROGRAMME	
	Does the Entity have a programme that sets	
	minimum AML, CTF and Sanctions standards	
	regarding the following components:	
9 a	Appointed Officer with sufficient experience /	V
	expertise	Yes
	Cash Reporting	Yes
	CDD	Yes
• •	EDD	Yes
-	Beneficial Ownership	Yes
	Independent Testing	Yes
	Periodic Review	Yes
	Policies and Procedures	Yes
	Risk Assessment	Yes
9 j	Sanctions	Yes
	PEP Screening	Yes
	Adverse Information Screening	Yes
	Suspicious Activity Reporting	Yes
	Training and Education	Yes
	Transaction Monitoring	Yes
	Is the Entity's AML, CTF & Sanctions policy	
	approved at least annually by the Board or	Yes
	equivalent Senior Management Committee?	
	Does the Entity use third parties to carry out any	
	components of its AML, CTF & Sanctions programme?	No
11a	If Y, provide further details	
1 I a	ii 1, provide luttilei detalis	
0 4 1 1 7	TI DDIDEDY & CODDUCTION	
	I BRIBERY & CORRUPTION	
	Has the Entity documented policies and	
	procedures consistent with applicable ABC	Yes
	regulations and requirements to [reasonably]	1165
	prevent, detect and report bribery and corruption?	
	Does the Entity's internal audit function or other	
	independent third party cover ABC Policies and	Yes
	Procedures?	
	Does the Entity provide mandatory ABC training	Yes
	to:	Tres
	Board and Senior Committee Management	Yes
	1st Line of Defence	Yes
	2nd Line of Defence	Yes
	3rd Line of Defence	Yes
	3rd parties to which specific compliance	
	activities subject to ABC risk have been	No
	outsourced	
14 f	Non-employed workers as appropriate	No
	(contractors / consultants)	

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4. PO	LICIES & PROCEDURES	
15	Has the Entity documented policies and	
	procedures consistent with applicable AML,	
	CTF & Sanctions regulations and requirements	
	to reasonably prevent, detect and report:	
15 a	Money laundering	Yes
15 b	Terrorist financing	Yes
15 с	Sanctions violations	Yes
16	Does the Entity have policies and procedures that:	
16 a	Prohibit the opening and keeping of anonymous and fictitious named accounts	Yes
16 b	Prohibit the opening and keeping of accounts for unlicensed banks and / or NBFIs	Yes
16 c	Prohibit dealing with other entities that provide banking services to unlicensed banks	Yes
16 d	Prohibit accounts / relationships with shell banks	Yes
16 e	Prohibit dealing with another Entity that provides services to shell banks	Yes
16 f	Prohibit opening and keeping of accounts for Section 311 designated entities	Yes
16 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
16 h	Assess the risks of relationships with PEPs, including their family and close associates	Yes
16 i	Define escalation processes for financial crime risk issues	Yes
16 j	Specify how potentially suspicious activity identified by employees is to be escalated and investigated	Yes
16 k	Outline the processes regarding screening for sanctions, PEPs and negative media	Yes
17	Has the Entity defined a risk tolerance statement or similar document which defines a risk boundary around their business?	Yes
18	Does the Entity have a record retention procedures that comply with applicable laws?	Yes
18 a	If Y, what is the retention period?	5 years or more

Does the Entity verify the identity of the customer? 20 Do the Entity's policies and procedures set out when CDD must be completed, e.g. at the time of orbidanting or within 3 days. 21 Which of the following does the Entity gather and retarn when conducting CDD? Select all that apply. 21 a Ownership structure Yes 21 b Customer identification Yes 21 c Expected activity Yes 21 d Nature of business / employment Yes 21 f Purpose and nature of relationship Yes 21 g Source of funds Yes 21 g Source of funds Yes 22 a Vereach of the following identified: 22 a Ultimate beneficial ownership Yes 22 at Are ustimate beneficial owners verified? 22 a Var using the process result in Yes 22 b Authorised signatories (where applicable) Yes 22 c Key controllers 22 c Key controllers 23 Does the due diligence process result in customers receiving a risk classification yes 24 Does the firstly have a risk based approach to determine whether they are PEPs, or controlled by PEPs? 25 Does the Entity have a risk based approach to determine whether they are PEPs, or controlled by PEPs? 26 Does the Entity have a risk based approach to determine whether they are PEPs, or controlled by PEPs? 27 a Does the Entity have a risk based approach to determine whether they are PEPs, or controlled by PEPs? 28 b Trigger event 29 b Non-account customers and connected parties to determine whether they are pEPs, or controlled by PEPs? 29 controllers 29 b Non-account customers and subject to EDD and ESC procedures of Controller of the subove EDD and ESC procedures of Controller of		C, CDD and EDD	
when CDD must be completed, e.g., at the time of onboarding or within 30 days 21 Which of the following does the Entity gather and retain when conducting CD0? Select all that apply. 21 a Which of the following does the Entity gather all that apply. 21 b Customer identification Yes 21 b Customer identification Yes 21 c Expected activity Yes 21 d Nature of business / employment Yes 21 e Product usage Yes 21 f Purpose and nature of relationship Yes 21 g Source of funds Yes 21 g Source of funds Yes 21 h Source of funds Yes 22 a Are utimate beneficial ownership Yes 22 a Are utimate beneficial owners verified? Yes 22 a Are utimate beneficial owners verified? Yes 22 b Authorised signatories (where applicable) Yes 22 c Key controllers Yes 22 d Other relevant parties KYC on Trust, includes identification and verification of all parties connected. 23 Does the due diligence process result in customers receiving a risk classification? Yes 24 D Does the Entity have a fiscalate potential matches from screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs? 25 Does the Entity have a process to review and escalate potential matches from screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs? 26 Does the Entity have a process to review and update customer information based on: 27 b Tom the list below, which categories of customers or industries are subject to EDD and or or are restricted, or prohibited by the Entity's PCC programmers 27 a Non-account customers None of the above		customer?	Yes
and retain when conducting CDD? Select all that apply: 21 a Ownership structure 21 b Customer Identification Yes 21 c Expected activity Yes 21 d Nature of business / employment Yes 21 d Nature of business / employment Yes 21 d Nature of business / employment Yes 21 f Product usage Yes 21 f Product usage Yes 21 f Purpose and nature of relationship Yes 21 g Source of funds Yes 21 g Source of wealth Yes 22 a Ultimate beneficial ownership Yes 22 a Ultimate beneficial ownership Yes 22 a Ultimate beneficial owners verified? Yes 22 b Authorised signatories (where applicable) Yes 22 c Key controllers Yes 22 d Other relevant parties KYC on Trust, includes identification and verification of all parties connected. KYC on Trust, includes identification and verification of all parties connected. Yes 23 Does the due diligence process result in unstomers receiving a risk classification? Yes 24 Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs? 25 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? 26 Does the Entity have a process to review and update customer information based on: 27 Does the Entity have a process to review and update customer information based on: 28 a KYC renewal Yes 29 Time the list below, which categories of customers or industries are subject to EDD and of or are restricted, or probleted by the Entity's ECC programme? 27 A Non-account customers None of the above		when CDD must be completed, e.g. at the time of onboarding or within 30 days	Yes
21 b Customer Identification Yes 21 c Expected activity Yes 21 d Nature of business / employment Yes 21 e Product usage Yes 21 f Pupose and nature of relationship Yes 21 g Source of funds Yes 21 g Source of funds Yes 22 l Source of funds Yes 22 a Utimate beneficial ownership Yes 22 a Utimate beneficial ownership Yes 22 a Utimate beneficial owners verified? Yes 22 b Authorised signatories (where applicable) Yes 22 c Key controllers 23 Does the due diligence process result in customers receiving a risk classification? 24 Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs? 25 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? 26 Does the Entity have a process to review and update customer information based on: 27 From the list below, which categories of customers or industries are subject to EDD and /or are restricted, or prohibited by the Entity Security of school of the above 27 Non-account customers None of the above		and retain when conducting CDD? Select	
21 c Expected activity Yes 21 d Nature of business / employment Yes 21 f Product usage Yes 21 f Propose and nature of relationship Yes 21 f Purpose and nature of relationship Yes 21 f Source of funds Yes 21 f Source of wealth Yes 21 f Source of wealth Yes 22 f Are each of the following identified: 22 a Ultimate beneficial ownership Yes 22 a Ultimate beneficial ownership Yes 22 a 1 Are ultimate beneficial owners verified? Yes 22 a 1 Authorised signatories (where applicable) Yes 22 a 1 Availtimate beneficial owners verified? Yes 23 Does the due diligence process result in customers receiving a risk classification? 24 Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs? 25 Does the Entity have and escalate potential matches from screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs? 26 Does the Entity have a process to review and update customer information based on: 27 Description the state below, which categories of customers or industries are subject to EDD and / or are restricted, or prohibited by the Entity's FCC programme? 27 Non-account customers 27 Non-account customers 27 Non-account customers 27 Non-account customers 28 Non-account customers 28 Non-account customers	21 a	Ownership structure	Yes
21 d Nature of business / employment Yes 21 e Product usage Yes 21 f Purpose and nature of relationship Yes 21 g Source of funds Yes 21 g Source of funds Yes 21 h Source of wealth Yes 22 Are each of the following identified: 22 a Ultimate beneficial owners verified? 23 d Ultimate beneficial owners verified? 24 Athorised signatories (where applicable) Yes 22 to Authorised signatories (where applicable) Yes 22 to Key controllers Yes 22 to Other relevant parties KYC on Trust, includes identification and verification of all parties connected. 23 Does the due diligence process result in customers receiving a risk dassification? 24 Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs? 25 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? 26 Does the Entity have a process to review and update customer information based on: 27 Error 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? 27 Non-account customers None of the above		Customer identification	Yes
21 e Product usage Yes 21 f Purpose and nature of relationship Yes 21 f Source of funds Yes 21 h Source of wealth Yes 22 l Source of wealth Yes 22 l Are ach of the following identified: 22 a Uttimate beneficial ownership Yes 22 at I Are uttimate beneficial owners verified? 22 at Authorised signatories (where applicable) Yes 22 c Key controllers Yes 22 d Other relevant parties KYC on Trust, includes identification and verification of all parties connected. 23 Does the due diligence process result in customers receiving a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controllers and processes to review and escalate potential matches from screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs? 26 Does the Entity have a process to review and connected parties to determine whether they are PEPs, or controlled by PEPs? 26 Does the Entity have a process to review and update customer information based on: 27 From the list below, which categories of customers or industries are subject to EDD and /or are restricted, or prohibited by the Entity FCC programme? None of the above None of the above	21 c	Expected activity	Yes
21 ft Purpose and nature of relationship Yes 21 gt Source of funds Yes 21 ht Source of wealth Yes 22 heach of the following identified: 22 a Vereach of the following identified: 22 a Ultimate beneficial ownership Yes 22 at I Are ultimate beneficial ownership Yes 22 at I Are ultimate beneficial owners verified? 22 at Okey controllers Yes 22 dt Okey controllers Yes 22 dt Oiher relevant parties KYC on Trust, includes identification and verification of all parties connected. 23 Does the due diligence process result in customers receiving a risk classification? 24 Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs? 25 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? 26 Does the Entity have a process to review and update customer information based on: 26 a KYC renewal Yes 27 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? None of the above	21 d	Nature of business / employment	Yes
21 g Source of funds	21 e	Product usage	Yes
21 h Source of wealth Yes 22 Are each of the following identified: 23 a Ultimate beneficial ownership Yes 24 at variutimate beneficial owners verified? Yes 25 b Authorised signatories (where applicable) Yes 26 c Key controllers Yes 27 d Other relevant parties KYC on Trust, includes identification and verification of all parties connected. 23 Does the due diligence process result in customers receiving a risk classification? 24 Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs? 25 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? 26 Does the Entity have a process to review and update customer information based on: 26 KYC renewal Yes 27 From the list below, which categories of customers or industries are subject to EDD and /or are restricted, or prohibited by the Entitys / FCC programme? 27 Non-account customers 27 Non-account customers 3 None of the above 3 Offshore customers 4 None of the above 5 None of the above 5 Offshore customers 5 None of the above	21 f	Purpose and nature of relationship	Yes
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22 at Are ultimate beneficial owners verified? 22 b Authorised signatories (where applicable) 22 c Key controllers 23 Cother relevant parties 24 Cother relevant parties 25 Cother relevant parties 26 Cother relevant parties 27 Cother relevant parties 28 Cother relevant parties 29 Cother relevant parties 29 Cother relevant parties 29 Cother relevant parties 29 Cother relevant parties 20 Cother relevant parties 20 Cother relevant parties 20 Cother relevant parties 21 Cother relevant parties 22 Cother relevant parties 23 Cother relevant parties 24 Cother relevant parties 25 Cother relevant parties 26 Cother relevant parties 26 Cother relevant parties 27 Cother relevant parties 28 Cother relevant parties 29 Cother relevant parties 20 Cother relevant parties 21 Cother relevant parties connected. 22 Cother relevant parties connected. 23 Cother relevant parties connected. 24 Cother relevant parties connected. 25 Cother relevant parties parties connected parties	22	Are each of the following identified:	
22 b Authorised signatories (where applicable) 22 c Key controllers 23 Other relevant parties KYC on Trust, includes identification and verification of all parties connected. 23 Does the due diligence process result in customers receiving a risk classification? 24 Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs? 25 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? 26 Does the Entity have a process to review and update customer information based on: 26 a KYC renewal Yes Trigger event Yes 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? Processing a Manual Carlos of the above of the above of the solution of the so	22 a	Ultimate beneficial ownership	Yes
22 c Key controllers 22 d Other relevant parties KYC on Trust, includes identification and verification of all parties connected. KYC on Trust, includes identification and verification of all parties connected. CYC on Trust, includes identification and verification of all parties connected. CYC on Trust, includes identification and verification of all parties connected parties to determine whether they are PEPs, or controlled by PEPs? CYC 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? CYC Does the Entity have a process to review and update customer information based on: Yes Yes Yes Trigger event Yes 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? Non-account customers None of the above	22 a1	Are ultimate beneficial owners verified?	Yes
22 c Key controllers Yes 22 d Other relevant parties KYC on Trust, includes identification and verification of all parties connected. 23 Does the due diligence process result in customers receiving a risk classification? 24 Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs? 25 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? 26 Does the Entity have a process to review and update customer information based on: 26 a KYC renewal 27 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? 27 a Non-account customers None of the above	22 b	Authorised signatories (where applicable)	
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update customer information based on: 26 a KYC renewal Yes 26 b Trigger event Yes 27 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? 27 a Non-account customers None of the above 27 b Offshore customers		processes to review and escalate potential matches from screening customers and connected parties to determine whether they	Yes
26 b Trigger event Yes 27 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? 27 a Non-account customers None of the above 27 b Offshore customers	26		
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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? 27 a Non-account customers None of the above 27 b Offshore customers	26 b	Trigger event	
27 b Offshore customers		customers or industries are subject to EDD and / or are restricted, or prohibited by the Entity's FCC programme?	
			None of the above
	210	Onanore customers	EDD & Restricted on a risk based approach

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27 с	Shell banks	Prohibited
27 d	MVTS/ MSB customers	EDD & Restricted on a risk based approach
27 е	PEPs	EDD & Restricted on a risk based approach
27 f	PEP Related	EDD & Restricted on a risk based approach
27 g	PEP Close Associate	EDD & Restricted on a risk based approach
27 h	Correspondent Banks	EDD on a risk based approach
27 h1	If EDD or EDD & Restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2014?	Yes
27 i	Arms, defense, military	Prohibited
27 j	Atomic power	EDD & Restricted on a risk based approach
27 k	Extractive industries	EDD & Restricted on a risk based approach
27 I	Precious metals and stones	EDD & Restricted on a risk based approach
27 m	Unregulated charities	EDD & Restricted on a risk based approach
27 n	Regulated charities	EDD on a risk based approach
27 о	Red light business / Adult entertainment	EDD & Restricted on a risk based approach
27 p	Non-Government Organisations	EDD on a risk based approach
27 q	Virtual currencies	EDD & Restricted on a risk based approach
27 r	Marijuana	EDD & Restricted on a risk based approach
27 s	Embassies / Consulates	EDD & Restricted on a risk based approach
27 t	Gambling	EDD & Restricted on a risk based approach
27 u	Payment Service Provider	EDD & Restricted on a risk based approach
27 v	Other (specify)	Sectors of economic activity at risk; trust; customers residing in high-risk countries; companies with a chain of complex participative ownership; customers under investigation by the judicial authority; associations, foundations, non-profit organ.; buy gold business; fiduciary companies not registered; asylum seekers.
28	If restricted, provide details of the restriction	The restrictions may be articulated in: authorizations by the Board of Directors or by the Chief Executive Officer or in assessments by the Anti-Money Laundering Function.

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	NITORING & REPORTING	
29	Does the Entity have risk based policies, procedures and monitoring processes for the identification and reporting of suspicious activity?	Yes
30	What is the method used by the Entity to monitor transactions for suspicious activities?	
30 a	Automated	Yes
30 b	Manual	Yes
30 с	Combination of automated and manual	Yes
31	Does the Entity have regulatory requirements to report currency transactions?	Yes
31 a	If Y, does the Entity have policies, procedures and processes to comply with currency reporting requirements?	Yes
32	Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity?	Yes
7. PA	YMENT TRANSPARENCY	
33	Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards?	Yes
34	Does the Entity have policies, procedures and processes to [reasonably] comply with and have controls in place to ensure compliance with:	
34 a	FATF Recommendation 16	Yes
34 b	Local Regulations	Yes
34 b1	Specify the regulation	Regulation (EU) 2015/847 of the European Parliament and of the Council of 20 may 2015 on information accompanying transfers of funds and repealing regulation (EC) n. 1781/2006
34 c	If N, explain	

~ >4	NCTIONS	
35	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	Yes
	stripping, or the resubmission and / or masking,	
	of sanctions relevant information in cross border transactions?	
36	Does the Entity screen its customers, including	
	beneficial ownership information collected by the Entity, during onboarding and regularly	Yes
	thereafter against Sanctions Lists?	
37	Select the Sanctions Lists used by the	
	Entity in its sanctions screening processes:	
37 a	Consolidated United Nations Security Council	
	Sanctions List (UN)	Used for screening customers and beneficial owners and for filtering transactional data
37 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
37 с	Office of Financial Sanctions Implementation	Head for corporing quotomers and honoficial owners and for filtering transportional data
	HMT (OFSI)	Used for screening customers and beneficial owners and for filtering transactional data
37 d	European Union Consolidated List (EU)	Used for screening customers and beneficial owners and for filtering transactional data
37 e	Other (specify)	
37 E	Other (specify)	Every list selected by "World-Check list".
38	Does the Entity have a physical presence, e.g.,	
	branches, subsidiaries, or representative offices	
	located in countries / regions against which UN,	No
	OFAC, OFSI, EU and G7 member countries have enacted comprehensive jurisdiction-based	
	Sanctions?	
9. TR	AINING & EDUCATION	<u> </u>
39	Does the Entity provide mandatory training,	
	which includes :	
39 a	Identification and reporting of transactions to	
	government authorities	Yes
39 b	Examples of different forms of money	
	laundering, terrorist financing and sanctions	
		Von
1	violations relevant for the types of products and	Yes
	violations relevant for the types of products and services offered	Yes
39 с	violations relevant for the types of products and services offered Internal policies for controlling money	
39 c	violations relevant for the types of products and services offered	Yes
39 c 39 d	violations relevant for the types of products and services offered Internal policies for controlling money laundering, terrorist financing and sanctions violations New issues that occur in the market, e.g.,	Yes
	violations relevant for the types of products and services offered Internal policies for controlling money laundering, terrorist financing and sanctions violations	
	violations relevant for the types of products and services offered Internal policies for controlling money laundering, terrorist financing and sanctions violations New issues that occur in the market, e.g.,	Yes Yes
39 d	violations relevant for the types of products and services offered Internal policies for controlling money laundering, terrorist financing and sanctions violations New issues that occur in the market, e.g., significant regulatory actions or new regulations	Yes Yes Yes
39 d 40	violations relevant for the types of products and services offered Internal policies for controlling money laundering, terrorist financing and sanctions violations New issues that occur in the market, e.g., significant regulatory actions or new regulations Is the above mandatory training provided to:	Yes Yes Yes Yes
39 d 40 40 a 40 b	violations relevant for the types of products and services offered Internal policies for controlling money laundering, terrorist financing and sanctions violations New issues that occur in the market, e.g., significant regulatory actions or new regulations Is the above mandatory training provided to: Board and Senior Committee Management 1st Line of Defence	Yes Yes Yes Yes Yes Yes
39 d 40 40 a 40 b 40 c	violations relevant for the types of products and services offered Internal policies for controlling money laundering, terrorist financing and sanctions violations New issues that occur in the market, e.g., significant regulatory actions or new regulations Is the above mandatory training provided to: Board and Senior Committee Management 1st Line of Defence 2nd Line of Defence	Yes Yes Yes Yes Yes Yes Yes
39 d 40 40 a 40 b 40 c 40 d	violations relevant for the types of products and services offered Internal policies for controlling money laundering, terrorist financing and sanctions violations New issues that occur in the market, e.g., significant regulatory actions or new regulations Is the above mandatory training provided to: Board and Senior Committee Management 1st Line of Defence 2nd Line of Defence 3rd Line of Defence	Yes Yes Yes Yes Yes Yes
39 d 40 40 a 40 b	violations relevant for the types of products and services offered Internal policies for controlling money laundering, terrorist financing and sanctions violations New issues that occur in the market, e.g., significant regulatory actions or new regulations 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	Yes Yes Yes Yes Yes Yes Yes
39 d 40 40 a 40 b 40 c 40 d	violations relevant for the types of products and services offered Internal policies for controlling money laundering, terrorist financing and sanctions violations New issues that occur in the market, e.g., significant regulatory actions or new regulations Is the above mandatory training provided to: Board and Senior Committee Management 1st Line of Defence 2nd Line of Defence 3rd Line of Defence	Yes Yes Yes Yes Yes Yes Yes Yes Yes
39 d 40 40 a 40 b 40 c 40 d 40 e	violations relevant for the types of products and services offered Internal policies for controlling money laundering, terrorist financing and sanctions violations New issues that occur in the market, e.g., significant regulatory actions or new regulations 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	Yes Yes Yes Yes Yes Yes Yes Yes Yes
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39 d 40 40 a 40 b 40 c 40 d 40 e 40 f	violations relevant for the types of products and services offered Internal policies for controlling money laundering, terrorist financing and sanctions violations New issues that occur in the market, e.g., significant regulatory actions or new regulations 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) JDIT In addition to inspections by the government supervisors / regulators, does the Entity have an internal audit function, a testing function or	Yes Yes Yes Yes Yes Yes Yes No No

Milano, 28/05/2020

