

Banca Popolare di Sondrio's AML/CTF Questionnaire

Please return a signed scanned copy of this completed questionnaire

Section 1 - General information about your financial institution	
1. Full name:	BANCA POPOLARE DI SONDRIO SPA
2. Full registered address:	Piazza Garibaldi 16, 23100 Sondrio (Italy)
3. Mailing address (if different from registered address):	See above
4. Telephone and web address:	+390342528111 https://istituzionale.popso.it/it
5. Country and date of incorporation:	Italy, 1871
6. Legal form:	Joint stock company
7. Registration/Licence no.:	842
8. BIC/Swift Code:	POSOIT22XXX
9. Legal representative and name of CEO:	Legal representative: Mr. Francesco Venosta CEO Mr. Mario Alberto Pedranzini
10. Principal place of business:	Northern Italy and Rome
11. Full name and website of your institution's regulatory or supervising authority:	European Central Bank https://www.ecb.europa.eu/home/html/index.en .
12. Full name and website of your institution's Financial Intelligence Unit:	Unità di Informazione Finanziaria per l'Italia (Italian FIU) https://uif.bancaditalia.it/
13. Is your institution subject to external audit activities? If yes, please provide the name of your external auditor	Yes Ernst & Young SPA
14. Principal banking/financial activity:	Full banking licence
15. Principal banking services offered to your customers (i.e. private banking; corporate banking; trade finance; investment banking; retail banking):	retail, corporate, commercial, trade finance
16. Is your financial institution a private company or a state-owned company?	Private



<p>17. Is your institution listed on any stock exchange?</p>	<p><input checked="" type="checkbox"/> YES Stock exchange: Milan SE ISIN: IT0000784196</p> <p><input type="checkbox"/> NO</p>
<p>18. Is your financial institution part of a Group? If yes, which Group?</p>	<p>YES Gruppo bancario Banca Popolare di Sondrio</p>
<p>19. Ownership information: list of owners (legal entities) holding at least 10% of the company at any layer</p> <p>(please, enclose a list if necessary)</p>	<p>nobody holds more than 10% of the company.</p>



<p>20. Ultimate beneficial owners (please, enclose a copy of the ID documents):</p> <p><i>Ultimate beneficial owner: the individual or individuals to whom, ultimately, the direct or indirect ownership of the entity or its control are attributable or who are the beneficiaries. In the case of corporations or other private legal entities, even if based abroad, the ultimate beneficial owner is identified according to the following criteria:</i></p> <ul style="list-style-type: none">- <i>the individual or individuals who hold or have direct or indirect control over a percentage exceeding 25% in the share capital or voting rights relative to the company;</i>- <i>one or more subjects that control the company, in consideration of any influence exercised over decisions reserved for shareholders;</i>- <i>when none of the conditions pursuant to the previous points are met, the individual that has management powers (Managing Director, Chairman of the BoD or Legal Representative).</i>	<p>Surname and given name: Mr. Mario Alberto Pedranzini (Managing Director and General Manager) Date and place of birth: 11th June 1950 in Bormio Full address: Via della Vittoria 41, Bormio (Italy) Gender (male/female): male</p>
-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------



<p>21. List of members of Board of directors:</p>	<p>Please see website: https://istituzionale.popso.it/it/governance/organi-sociali</p>
---------------------------------------------------	----------------------------------------------------------------------------------------------------------------------------------------------------------------------

22. Are there Political Exposed Persons (PEPs)* among shareholders or members of the board of directors?	Yes Mrs. Serenella Rossi – member of the Board
23. Fatca status	<input checked="" type="checkbox"/> Compliant <input type="checkbox"/> Non-compliant
24. Global Intermediary Identification Number (GIIN)	8DKNK7.00000.LE.380
25. Legal Entity Identifier (LEI)	J48C8PCSJVUBR8KCW529
26. Key contact person:	Name: Mr. Costantino Tornadù Title: Head of AML and Compliance Dept. Address: Piazza Garibaldi 16, 23100 Sondrio e-mail: funzione.antiriciclaggio@popso.it Telephone: +390342528111

Section 2 - Internal policies and procedures	
27. Are money laundering and terrorist financing criminal offences in your country?	YES
28. Does your institution have customers, branches or subsidiaries that operate in countries subject to UN, EU, US (OFAC) or other sanctions blacklists? If Yes, in which countries?	YES (Iranian customers)
29. If yes, does your institution apply enhanced due diligence measures and review the transactions of such entities with particular care?	YES
30. Does your institution monitor and evaluate transactions for sanctioned entities and countries before execution?	YES
31. If yes, please indicate the respective sanction lists: <input checked="" type="checkbox"/> UN <input checked="" type="checkbox"/> EU <input checked="" type="checkbox"/> US (OFAC) <input type="checkbox"/> local lists <input type="checkbox"/> Others	
32. Has your bank established internal written policies and procedures to ensure compliance with the obligations under the existing national legislation on prevention of money laundering and counter terrorist financing?	YES
33. Do the AML/CTF policies and procedures apply to all branches and subsidiaries both in the home country and outside it?	YES
34. Does your AML and CTF Compliance program require approval of your Board or a senior manager committee thereof?	YES
35. Does your bank review those policies and procedures? If yes, how often are the policies and procedures updated?	YES (annually)

<p>36. Do your AML/CTF policies and procedures require the application of the measures listed below?</p> <p>Do they require you to comply with customer due diligence measures when:</p> <p>a) establishing a business relationship?</p> <p>b) carrying out occasional transactions of significant amount?</p>	<p>YES</p>
<p>37. Do they require you to include in the customer due diligence the following:</p> <p>a) Identifying the customer and verifying the customer's identity on documents, data or information obtained from a reliable and independent source?</p> <p>b) Identifying the beneficial owner and verifying his identity?</p> <p>c) Obtaining information on the purpose and intended nature of the business relationship?</p> <p>d) Conducting ongoing monitoring of the business relationship?</p>	<p>YES</p>
<p>38. Do they prohibit you from keeping anonymous accounts?</p>	<p>YES</p>
<p>39. If "no", can you confirm that there are no cases where you do not perform enhanced KYC identification procedures when opening such anonymous accounts?</p>	<p>N.A.</p>
<p>40. Do they require to perform a risk focused assessment of your customers and transactions?</p>	<p>YES</p>
<p>41. Do they require you to have enhanced due diligence measures for transactions or business relationships with "Politically Exposed Persons"?</p>	<p>YES</p>
<p>42. Do they require you to have enhanced due diligence measures in the following cases:</p> <p>a) Situations which by their nature can present a higher risk of money laundering or terrorist financing (e.g. politically exposed persons, customers from high risk countries/jurisdictions)?</p> <p>b) When the customer has been not physically present for identification purposes?</p> <p>c) In respect of cross-frontier correspondent banking relationships and other similar relationships with respondent institutions from third countries?</p>	<p>YES</p>
<p>43. Does your bank assess its Financial Institutions customers' AML/CTF policies and practices?</p>	<p>YES</p>
<p>44. Do your policies require you to establish effective controls on a permanent basis to detect any activities suspected of money laundering and terrorist financing?</p>	<p>YES</p>



45. Does your bank have a monitoring system for all payments to enable you to detect suspicious payments or transactions?	YES
46. If yes, does your bank have an established method of reporting suspicious activities and/or transactions to the appropriate authorities?	YES
47. Does your bank have a screening process to search your client database against government published lists of prohibited parties?	YES
48. If yes, please provide sources:	WorldCheck; SGR Consulting; local lists
49. Do your policies and procedures require you to keep customer identification account files, business correspondence and records for a specific period? If yes, for how long?	YES (10 YEARS)
50. Does your regulatory Supervisory Authority undertake monitoring visits on a regular basis, to assess your money laundering and terrorist financing policies and procedures?	YES
51. Do they require you to have an established mandatory employee training program upon anti-money laundering and counter terrorist financing rules and procedures for all management and staff?	YES
52. Can you confirm that your institution prohibit/refuse services to "shell banks"?	YES
53. Can you confirm that your institution does not allow direct use of correspondent account by third parties (payable through accounts) to transact business on their own behalf?	YES
54. If "no", please confirm that you will provide us with full details of those third parties as and when required by our government authorities.	N.A.
55. Can you confirm that your bank has not been prosecuted or fined for failure to comply with anti-money laundering laws in the last 5 years?	YES
56. Do you report cash transactions exceeding a regulatory defined threshold to the regulatory/competent authority?	YES
57. Do you report wire transfers exceeding threshold to a regulatory/competent authority?	YES
58. Where cash transactions reporting is mandatory, do you have procedures to identify transactions structured to avoid such obligations?	YES
59. Do your policy cover transactions for walk-in customers and do you acquire a valid ID card from such customers prior to conducting business transactions?	YES
60. Does your outgoing wire transfer include names of originator and beneficiary and other relevant information such as account number, address?	YES



61. Does the bank apply enhanced due diligence measures to the following categories of customers/industries? Or are they restricted/prohibited? a) oil/estrawctive industries; b) arms; c) precious stones; d) tobacco products; e) trade of endangered species (flora and fauna, e.g. ivory); f) trade of art works, archaeological heritage, scientific, religious or cultural works/manufactures	YES
62. Does the bank maintain relationships or carry out transactions towards providers of services relating to the use of a virtual currency (or "cryptocurrency")?	NO (prohibited)
63. Is the institution subject to any privacy/confidentiality regulations or laws that would preclude the institution from sharing any customer information with Banca Popolare di Sondrio?	NO

I declare that the information I have provided on this form is, to the best of my knowledge and belief, correct, accurate, true and complete.

Date: 29th of July 2022

Name: Costantino Tornadù

Function: Head of AML and Compliance Dept.

Signature and Company seal: _____