



Financial Institution Name:

Location (Country) :

Fideuram Asset Management (Ireland) dac

Ireland

No #	Question	Answer
<b>1. ENTITY &amp; OWNERSHIP</b>		
1	Full Legal name	Fideuram Asset Management (Ireland) dac
2	Append a list of foreign branches which are covered by this questionnaire (if applicable)	
3	Full Legal (Registered) Address	International House – 3 Harbourmaster Place - IFSC Dublin - D01 K8F1 - Ireland
4	Full Primary Business Address (if different from above)	
5	Date of Entity incorporation/establishment	FIDEURAM ASSET MANAGEMENT IRELAND ltd 18/10/2001, FIDEURAM ASSET MANAGEMENT IRELAND DAC 18/08/2016
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	INTESA SANPAOLO S.P.A.  100%  FIDEURAM - INTESA SANPAOLO PRIVATE BANKING S.P.A.  100%  FIDEURAM ASSET MANAGEMENT (IRELAND) DAC
7	% of the Entity's total shares composed of bearer shares	0
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	
9	Does the Bank have a Virtual Bank License or provide services only through online channels?	No
10	Provide Legal Entity Identifier (LEI) if available	EIIY70MZ51Q4RSX07995
<b>2. AML, CTF &amp; SANCTIONS PROGRAMME</b>		

<b>11</b>	Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:	
<b>11 a</b>	Appointed Officer with sufficient experience/expertise	Yes
<b>11 b</b>	Adverse Information Screening	Yes
<b>11 c</b>	Beneficial Ownership	Yes
<b>11 d</b>	Cash Reporting	Yes
<b>11 e</b>	CDD	Yes
<b>11 f</b>	EDD	Yes
<b>11 g</b>	Independent Testing	Yes
<b>11 h</b>	Periodic Review	Yes
<b>11 i</b>	Policies and Procedures	Yes
<b>11 j</b>	PEP Screening	Yes
<b>11 k</b>	Risk Assessment	Yes
<b>11 l</b>	Sanctions	Yes
<b>11 m</b>	Suspicious Activity Reporting	Yes
<b>11 n</b>	Training and Education	Yes
<b>11 o</b>	Transaction Monitoring	Yes
<b>12</b>	Is the Entity's AML, CTF & Sanctions policy approved at least annually by the Board or equivalent Senior Management Committee?	Yes
<b>13</b>	Does the Entity use third parties to carry out any components of its AML, CTF & Sanctions programme?	Yes
<b>13 a</b>	If Y, provide further details	Fideuram Asset Management Ireland outsources the transfer agency activities to International Financial Data Services (IFDS) and rely on the distributors to carry out customer due diligence and other relevant obligations in relation to the underlying clients.
<b>14</b>	Does the entity have a whistleblower policy?	Yes
<b>3. ANTI BRIBERY &amp; CORRUPTION</b>		
<b>15</b>	Has the Entity documented policies and procedures consistent with applicable ABC regulations and requirements to prevent, detect and report bribery and corruption?	Yes
<b>16</b>	Does the Entity's internal audit function or other independent third party cover ABC Policies and Procedures?	Yes
<b>17</b>	Does the Entity provide mandatory ABC training to:	
<b>17 a</b>	Board and Senior Committee Management	Yes
<b>17 b</b>	1st Line of Defence	Yes
<b>17 c</b>	2nd Line of Defence	Yes
<b>17 d</b>	3rd Line of Defence	Yes
<b>17 e</b>	Third parties to which specific compliance activities subject to ABC risk have been outsourced	Not Applicable
<b>17 f</b>	Non-employed workers as appropriate (contractors/consultants)	Yes

4. AML, CTF & SANCTIONS POLICIES & PROCEDURES		
18	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report:	
18 a	Money laundering	Yes
18 b	Terrorist financing	Yes
18 c	Sanctions violations	Yes
19	Does the Entity have policies and procedures that:	
19 a	Prohibit the opening and keeping of anonymous and fictitious named accounts	No
19 b	Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs	No
19 c	Prohibit dealing with other entities that provide banking services to unlicensed banks	No
19 d	Prohibit accounts/relationships with shell banks	No
19 e	Prohibit dealing with another Entity that provides services to shell banks	No
19 f	Prohibit opening and keeping of accounts for Section 311 designated entities	No
19 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	No
19 h	Assess the risks of relationships with domestic and foreign PEPs, including their family and close associates	Yes
19 i	Define the process for escalating financial crime risk issues/potentially suspicious activity identified by employees	Yes
19 j	Outline the processes regarding screening for sanctions, PEPs and negative media	Yes
20	Has the Entity defined a risk tolerance statement or similar document which defines a risk boundary around their business?	Yes
21	Does the Entity have record retention procedures that comply with applicable laws?	Yes
21 a	If Y, what is the retention period?	5 years or more
5. KYC, CDD and EDD		
22	Does the Entity verify the identity of the customer?	Yes
23	Do the Entity's policies and procedures set out when CDD must be completed, e.g. at the time of onboarding or within 30 days?	Yes
24	Which of the following does the Entity gather and retain when conducting CDD? Select all that apply:	
24 a	Customer identification	Yes
24 b	Expected activity	Yes

<b>24 c</b>	Nature of business/employment	Yes
<b>24 d</b>	Ownership structure	Yes
<b>24 e</b>	Product usage	Yes
<b>24 f</b>	Purpose and nature of relationship	Yes
<b>24 g</b>	Source of funds	Yes
<b>24 h</b>	Source of wealth	Yes
<b>25</b>	Are each of the following identified:	
<b>25 a</b>	Ultimate beneficial ownership	Yes
<b>25 a1</b>	Are ultimate beneficial owners verified?	Yes
<b>25 b</b>	Authorised signatories (where applicable)	Yes
<b>25 c</b>	Key controllers	Yes
<b>25 d</b>	Other relevant parties	Yes
<b>26</b>	Does the due diligence process result in customers receiving a risk classification?	Yes
<b>27</b>	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
<b>28</b>	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
<b>29</b>	Is KYC renewed at defined frequencies based on risk rating (Periodic Reviews)?	Yes
<b>29 a</b>	If yes, select all that apply:	
<b>29 a1</b>	Less than one year	No
<b>29 a2</b>	1 – 2 years	Yes
<b>29 a3</b>	3 – 4 years	No
<b>29 a4</b>	5 years or more	No
<b>29 a5</b>	Trigger-based or perpetual monitoring reviews	Yes
<b>29 a6</b>	Other	
<b>30</b>	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?	
<b>30 a</b>	Arms, Defence, Military	Do not have this category of customer or industry
<b>30 b</b>	Correspondent Banks	Do not have this category of customer or industry
<b>30 b1</b>	If EDD or EDD & restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022?	Yes
<b>30 c</b>	Embassies/Consulates	Do not have this category of customer or industry
<b>30 d</b>	Extractive industries	Do not have this category of customer or industry
<b>30 e</b>	Gambling customers	Do not have this category of customer or industry
<b>30 f</b>	General Trading Companies	Do not have this category of customer or industry
<b>30 g</b>	Marijuana-related Entities	Do not have this category of customer or industry
<b>30 h</b>	MVTS/ MSB customers	Do not have this category of customer or industry

30 i	Non-account customers	Do not have this category of customer or industry
30 j	Non-Government Organisations	Do not have this category of customer or industry
30 k	Non-resident customers	Do not have this category of customer or industry
30 l	Nuclear power	Do not have this category of customer or industry
30 m	Payment Service Provider	Do not have this category of customer or industry
30 n	PEPs	EDD on a risk based approach
30 o	PEP Close Associates	EDD on a risk based approach
30 p	PEP Related	EDD on a risk based approach
30 q	Precious metals and stones	Do not have this category of customer or industry
30 r	Red light businesses/Adult entertainment	Do not have this category of customer or industry
30 s	Regulated charities	Do not have this category of customer or industry
30 t	Shell banks	Do not have this category of customer or industry
30 u	Travel and Tour Companies	Do not have this category of customer or industry
30 v	Unregulated charities	Do not have this category of customer or industry
30 w	Used Car Dealers	Do not have this category of customer or industry
30 x	Virtual Asset Service Providers	Do not have this category of customer or industry
30 y	Other (specify)	
31	If restricted, provide details of the restriction	
<b>6. MONITORING &amp; REPORTING</b>		
32	Does the Entity have risk based policies, procedures and monitoring processes for the identification and reporting of suspicious activity?	Yes
33	What is the method used by the Entity to monitor transactions for suspicious activities?	Automated
33 a	If manual or combination selected, specify what type of transactions are monitored manually	
34	Does the Entity have regulatory requirements to report suspicious transactions?	Yes
34 a	If Y, does the Entity have policies, procedures and processes to comply with suspicious transactions reporting requirements?	Yes
35	Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity?	Yes
<b>7. PAYMENT TRANSPARENCY</b>		
36	Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards?	No
37	Does the Entity have policies, procedures and processes to comply with and have controls in place to ensure compliance with:	
37 a	FATF Recommendation 16	No
37 b	Local Regulations	No
37 b1	If Y, Specify the regulation	
37 c	If N, explain	This requirement is specific to Virtual Asset Service Providers (VASPs). Fideuram Asset Management Ireland is an Asset Management company.

8. SANCTIONS		
38	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
39	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
40	Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists?	Yes
41	Select the Sanctions Lists used by the Entity in its sanctions screening processes:	
41 a	Consolidated United Nations Security Council Sanctions List (UN)	Used for screening customers and beneficial owners (i.e. reference data)
41 b	United States Department of the Treasury's Office of Foreign Assets Control (OFAC)	Used for screening customers and beneficial owners (i.e. reference data)
41 c	Office of Financial Sanctions Implementation HMT (OFSI)	Used for screening customers and beneficial owners (i.e. reference data)
41 d	European Union Consolidated List (EU)	Used for screening customers and beneficial owners (i.e. reference data)
41 e	Lists maintained by other G7 member countries	Not used
41 f	Other (specify)	
42	Does the Entity have a physical presence, e.g. branches, subsidiaries, or representative offices located in countries/regions against which UN, OFAC, OFSI, EU and G7 member countries have enacted comprehensive jurisdiction-based Sanctions?	No
9. TRAINING & EDUCATION		
43	Does the Entity provide mandatory training, which includes :	
43 a	Identification and reporting of transactions to government authorities	Yes
43 b	Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered	Yes
43 c	Internal policies for controlling money laundering, terrorist financing and sanctions violations	Yes
43 d	New issues that occur in the market, e.g. significant regulatory actions or new regulations	Yes
44	Is the above mandatory training provided to :	
44 a	Board and Senior Committee Management	Yes

44 b	1st Line of Defence	Yes
44 c	2nd Line of Defence	Yes
44 d	3rd Line of Defence	Yes
44 e	Third parties to which specific FCC activities have been outsourced	Not Applicable
44 f	Non-employed workers (contractors/consultants)	Yes
10. AUDIT		
45	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

Signature Page

Wolfsberg Group Financial Crime Compliance Questionnaire 2022 (FCCQ V1.2)

Fideuram Asset Management (Ireland) dac

(Financial Institution name)

I, Amina Attia El Tabakh (Senior Compliance Manager- Second Line representative), certify that I have read and understood this declaration, that the answers provided in this Wolfsberg FCCQ are complete and correct to my honest belief.

27/02/2025

Amina Attia El Tabakh

(Signature & Date)