



Financial Institution Name:

Fideuram - Intesa Sanpaolo Private Banking Asset Management SGR S.p.A.

Location (Country) :

Italy

| No # | Question | Answer |
|----------------------------------|---|--|
| 1. ENTITY & OWNERSHIP | | |
| 1 | Full Legal name | Fideuram - Intesa Sanpaolo Private Banking Asset Management Società di Gestione del Risparmio S.p.A. |
| 2 | Append a list of foreign branches which are covered by this questionnaire (if applicable) | N/A |
| 3 | Full Legal (Registered) Address | Via Montebello 18 - 20121 Milano (Italy) |
| 4 | Full Primary Business Address (if different from above) | N/A |
| 5 | Date of Entity incorporation / establishment | 8th October 1986 |
| 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 | Controlled (99.5%) by Intesa Sanpaolo Private Banking S.p.A., with registered office in Piazza San Carlo 156, 210121 Torino (Italy). |
| 7 | % of the Entity's total shares composed of bearer shares | No bearer shares are issued |
| 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. AML, CTF & SANCTIONS PROGRAMME | | |
|-----------------------------------|--|---|
| 9 | 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 / expertise | Yes |
| 9 b | Cash Reporting | Yes |
| 9 c | CDD | Yes |
| 9 d | EDD | Yes |
| 9 e | Beneficial Ownership | Yes |
| 9 f | Independent Testing | Yes |
| 9 g | Periodic Review | Yes |
| 9 h | Policies and Procedures | Yes |
| 9 i | Risk Assessment | Yes |
| 9 j | Sanctions | Yes |
| 9 k | PEP Screening | Yes |
| 9 l | Adverse Information Screening | Yes |
| 9 m | Suspicious Activity Reporting | Yes |
| 9 n | Training and Education | Yes |
| 9 o | Transaction Monitoring | Yes |
| 10 | Is the Entity's AML, CTF & Sanctions policy approved at least annually by the Board or equivalent Senior Management Committee? | Yes, internal policies and procedures are periodically reviewed and approved by the Board of Directors. |
| 11 | Does the Entity use third parties to carry out any components of its AML, CTF & Sanctions programme? | Yes |
| 11a | If Y, provide further details | Record keeping and transaction monitoring requirements are fulfilled also with the support of an administrative outsourcer. |

| 3. ANTI BRIBERY & CORRUPTION | | |
|------------------------------|--|----------------|
| 12 | Has the Entity documented policies and procedures consistent with applicable ABC regulations and requirements to [reasonably] prevent, detect and report bribery and corruption? | Yes |
| 13 | Does the Entity's internal audit function or other independent third party cover ABC Policies and Procedures? | Yes |
| 14 | Does the Entity provide mandatory ABC training to: | |
| 14 a | Board and Senior Committee Management | Yes |
| 14 b | 1st Line of Defence | Yes |
| 14 c | 2nd Line of Defence | Yes |
| 14 d | 3rd Line of Defence | Yes |
| 14 e | 3rd parties to which specific compliance activities subject to ABC risk have been outsourced | Not Applicable |
| 14 f | Non-employed workers as appropriate (contractors / consultants) | Not Applicable |

| 4. AML, CTF & SANCTIONS POLICIES & 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 c | 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 domestic and foreign 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? | |
| 18 a | If Y, what is the retention period? | 5 years or more |

| 5. KYC, CDD and EDD | | |
|---------------------|--|---|
| 19 | Does the Entity verify the identity of the customer? | Yes |
| 20 | 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 |
| 21 | Which of the following does the Entity gather and retain when conducting CDD? Select all that apply: | |
| 21 a | Ownership structure | Yes |
| 21 b | Customer identification | Yes |
| 21 c | Expected activity | |
| 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 h | Source of wealth | Yes |
| 22 | Are each of the following identified: | |
| 22 a | Ultimate beneficial ownership | Yes |
| 22 a1 | Are 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 to the legal arrangement (such as trustee, settlor, guardian, beneficiary(ies) and additional ultimate controllers). |
| 23 | Does the due diligence process result in customers 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? | Yes |
| 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? | Yes |
| 26 | Does the Entity have a process to review and update customer information based on: | |
| 26 a | KYC renewal | Yes |
| 26 b | Trigger event | Yes |

| | | |
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| 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 | Prohibited |
| 27 b | Non-resident customers | EDD on a risk based approach |
| 27 c | Shell banks | Prohibited |
| 27 d | MVTS/ MSB customers | Do not have this category of customer or industry |
| 27 e | PEPs | EDD on a risk based approach |
| 27 f | PEP Related | EDD on a risk based approach |
| 27 g | PEP Close Associate | EDD 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 | Do not have this category of customer or industry |
| 27 j | Atomic power | Do not have this category of customer or industry |
| 27 k | Extractive industries | EDD on a risk based approach |
| 27 l | Precious metals and stones | EDD on a risk based approach |
| 27 m | Unregulated charities | EDD on a risk based approach |
| 27 n | Regulated charities | EDD on a risk based approach |
| 27 o | Red light business / Adult entertainment | Do not have this category of customer or industry |
| 27 p | Non-Government Organisations | EDD on a risk based approach |
| 27 q | Virtual currencies | Do not have this category of customer or industry |
| 27 r | Marijuana | Do not have this category of customer or industry |
| 27 s | Embassies / Consulates | EDD on a risk based approach |
| 27 t | Gambling | Do not have this category of customer or industry |
| 27 u | Payment Service Provider | EDD on a risk based approach |
| 27 v | Other (specify) | Not Applicable |
| 28 | If restricted, provide details of the restriction | 27b: customers in countries with criticalities in terms of cooperation for tax purpose (EU/OECD lists) are subject to restrictions; 27i: allowed dealing with customers only if licenced by Italian/EU gov. to trade in these industries; 27r: allowed to the extent it is handled by the client for medical purposes. |

| 6. MONITORING & 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? | Automated |
| 31 | Does the Entity have regulatory requirements to report suspicious transactions? | Yes |
| 31 a | If Y, does the Entity have policies, procedures and processes to comply with suspicious transactions 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. PAYMENT TRANSPARENCY | | |
|-------------------------|---|---|
| 33 | Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards? | No |
| 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 | No |
| 34 b | Local Regulations | No |
| 34 b1 | Specify the regulation | |
| 34 c | If N, explain | The Entity doesn't make payments, that are carried out by the Depository Bank |

| 8. SANCTIONS | | |
|--------------|--|--|
| 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 stripping, or the resubmission and / or masking, of sanctions relevant information in cross border transactions? | Yes |
| 36 | Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists? | Yes |
| 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 (i.e. reference data) |
| 37 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) |
| 37 c | Office of Financial Sanctions Implementation HMT (OFSI) | Not used |
| 37 d | European Union Consolidated List (EU) | Used for screening customers and beneficial owners (i.e. reference data) |
| 37 e | Lists maintained by other G7 member countries | Not used |
| 37 f | Other (specify) | Internal lists, including those issued by local regulator. |
| 38 | 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 | | |
|-------------------------|---|----------------|
| 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 violations relevant for the types of products and services offered | Yes |
| 39 c | Internal policies for controlling money laundering, terrorist financing and sanctions violations | Yes |
| 39 d | New issues that occur in the market, e.g., significant regulatory actions or new regulations | Yes |
| 40 | Is the above mandatory training provided to : | |
| 40 a | Board and Senior Committee Management | Yes |
| 40 b | 1st Line of Defence | Yes |
| 40 c | 2nd Line of Defence | Yes |
| 40 d | 3rd Line of Defence | Yes |
| 40 e | 3rd parties to which specific FCC activities have been outsourced | Not Applicable |
| 40 f | Non-employed workers (contractors / consultants) | |

| 10. AUDIT | |
|-----------|---|
| 41 | <p>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 and Sanctions policies and practices on a regular basis?</p> <p>Yes</p> |

Signature Page

Wolfsberg Group Financial Crime Compliance Questionnaire 2020 (FCCQ V1.1)

Fideuram - Intesa Sanpaolo Private Banking Asset Management SGR S.p.A.

(Financial Institution name)

ERMANN0 BELLOTTI, AML Officer

I, (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.

18/03/2020 
(Signature & Date)