

## Financial Institutions KYC Questionnaire

Section 1: General Information	
Legal Name:	BANCA REALE SPA
Name of Regulatory Authority:	BANCA D'ITALIA
Principal Place of Business:	TORINO (ITALY)
Date Established:	11/05/1999
Registered at:	REGISTRO DELLE IMPRESE DI TORINO
Banking License:	ALBO BANCHE 5426
Bank Identifier Code (BIC):	BRTOITTTXXX
Tax Identification Number:	07760860010
Listed on:	NO
Website:	WWW.BANCAREALE.IT
Location of Head Office:	TORINO- CORSO GIUSEPPE SICCARDI 13
Compliance Officer Name:	DOTT. GIORGIO MENTUCCIA
Compliance Officer Telephone Number:	0115165555
Compliance Officer Email Address:	compliance@bancareale.it
Main Business Lines:	Funzione Compliance e Antiriciclaggio
Section 2: Ownership and Information Management	
Legal Form:	
Is your institution publicly owned?	Y <input type="checkbox"/> N <input checked="" type="checkbox"/>
Is your Institution listed on any stock exchanges? (if Yes, please state)	Y <input type="checkbox"/> N <input checked="" type="checkbox"/>
In order to determine the REAL OWNER, include list of shareholders / owners who directly or indirectly control or exercises control over 20%. If nobody controls more than 20%, detail the 10 largest shareholders / owners.	< Name / Percentage > REALE MUTUA ASSICURAZIONI (95%)

Indicate if your entity has Politically Exposed Persons (PEPs) within the boards of the bank.		Y <input type="checkbox"/>	N <input checked="" type="checkbox"/>
If yes, please detail below the name and position held.			
Name		Position	
Ownership details / shareholders:		<input type="checkbox"/> Listing attached	<input checked="" type="checkbox"/> Website
Members of the Board of Managing Directors:		<input type="checkbox"/> Listing attached	<input checked="" type="checkbox"/> Website
Members of the Supervisory Board:		<input type="checkbox"/> Listing attached	<input checked="" type="checkbox"/> Website
<b>Section 3: Anti-Money Laundering Questionnaire</b>			
<b>I. General AML Policies, Practices and Procedures</b>			
1. Does the AML compliance program require approval of the FI's Board or a senior committee thereof?	Y <input checked="" type="checkbox"/>	N <input type="checkbox"/>	
2. Does the FI have a legal and regulatory compliance program that includes a designated Compliance officer that is responsible for coordinating and overseeing the AML program on a day-to-day basis, which has been approved by senior management of the FI?	Y <input checked="" type="checkbox"/>	N <input type="checkbox"/>	
3. Has the FI developed written policies documenting the processes that they have in place to prevent, detect and report suspicious transactions that has been approved by senior management?	Y <input checked="" type="checkbox"/>	N <input type="checkbox"/>	
4. Has the country of domicile of the FI enacted laws designated to combat money laundering and terrorist financing?	Y <input checked="" type="checkbox"/>	N <input type="checkbox"/>	
5. Has your FI been examined by any governmental authority for compliance with anti-money laundering laws and regulations?(if Yes, please name the government authority)	Y <input checked="" type="checkbox"/>	N <input type="checkbox"/>	
6. In addition to inspections by the government supervisors/regulators, does the FI client have an internal audit function or other independent third party that assesses AML policies and practices on a regular basis?	Y <input checked="" type="checkbox"/>	N <input type="checkbox"/>	
7. Does the FI have a policy prohibiting accounts/ relationships with shell banks? (A shell bank is defined as a bank incorporated in a jurisdiction in which it has no physical presence and which is unaffiliated with a regulated financial group.)	Y <input checked="" type="checkbox"/>	N <input type="checkbox"/>	
8. Does the FI have policies covering relationships with politically exposed persons consistent with industry best practices?	Y <input checked="" type="checkbox"/>	N <input type="checkbox"/>	
9. Does the FI have appropriate record retention procedures pursuant to applicable law?	Y <input checked="" type="checkbox"/>	N <input type="checkbox"/>	
10. Does your Institution have a policy prohibiting direct use of the correspondent account by third parties to transact business with their own behalf? ( I.E. payable – through account or nested account )	Y <input checked="" type="checkbox"/>	N <input type="checkbox"/>	
11. Does your Institution faced any regulatory or criminal enforcement action resulting from violations of Anti-Money Laundering and/or Terrorist Financing laws or regulations in the past five years.	Y <input checked="" type="checkbox"/>	N <input type="checkbox"/>	
<b>II. Risk Assessment</b>			
12. Does the FI have a risk focused assessment of its customer base and transactions of its customers?	Y <input checked="" type="checkbox"/>	N <input type="checkbox"/>	

13. Does the FI determine the appropriate level of enhanced due diligence necessary for those categories of customers and transactions that the FI has reason to believe pose a heightened risk of illicit activities at or through the FI?	Y <input checked="" type="checkbox"/>	N <input type="checkbox"/>
<b>III. Know Your Customer, Due Diligence and Enhanced Due Diligence</b>		
14. Has the FI implemented systems for the identification of its customers, including customer information in the case of recorded transactions, account opening, etc.? (for example; name, nationality, street address, telephone number, occupation, age/ date of birth, number and type of valid official identification, as well as the name of the country/state that issued it)	Y <input checked="" type="checkbox"/>	N <input type="checkbox"/>
15. Does the FI have a requirement to collect information regarding its customers' business activities?	Y <input checked="" type="checkbox"/>	N <input type="checkbox"/>
16. Does the FI provide banking services for walk-in clients or others who do not maintain accounts? If yes, kindly define the type of service provided.	Y <input checked="" type="checkbox"/>	N <input type="checkbox"/>
17. Does the FI maintain anonymous accounts?	Y <input type="checkbox"/>	N <input checked="" type="checkbox"/>
18. Does the FI collect information and assess its FI customers' AML policies or practices?	Y <input checked="" type="checkbox"/>	N <input type="checkbox"/>
19. Does the FI have procedures to establish a record for each customer noting their respective identification documents and Know Your Customer Information collected at account opening?	Y <input checked="" type="checkbox"/>	N <input type="checkbox"/>
20. Does the FI take steps to understand the normal and expected transactions of its customers based on its risk assessment of its customers?	Y <input checked="" type="checkbox"/>	N <input type="checkbox"/>
21. Does the FI have a process to review and, if necessary, update the information regarding customers classified as high risk?	Y <input checked="" type="checkbox"/>	N <input type="checkbox"/>
<b>IV. Reportable Transactions and Prevention and Detection of Transactions with Illegally Obtained Funds</b>		
22. Does the FI have policies or practices for the identification and reporting of transactions that are required to be reported to the authorities?	Y <input checked="" type="checkbox"/>	N <input type="checkbox"/>
23. Does the FI have procedures to identify transactions structured to avoid large cash reporting requirements?	Y <input checked="" type="checkbox"/>	N <input type="checkbox"/>
24. Does the FI screen transactions for customers or transactions the FI deems to be of significantly high risk (which may include persons, entities or countries that are contained on lists issued by government/international bodies) that special attention to such customers or transactions is necessary prior to completing any such transactions?	Y <input checked="" type="checkbox"/>	N <input type="checkbox"/>
25. Does the FI have policies to reasonably ensure that they will not conduct transactions with or on behalf of shell banks through any of its accounts or products? (A shell bank is defined as a bank incorporated in a jurisdiction in which it has no physical presence and which is unaffiliated with a regulated financial group.)	Y <input checked="" type="checkbox"/>	N <input type="checkbox"/>
26. Does the FI have policies to reasonably ensure that it only operates with correspondent banks that possess licenses to operate in their countries of origin?	Y <input checked="" type="checkbox"/>	N <input type="checkbox"/>
<b>V. Transaction Monitoring</b>		
27. Does the FI have a monitoring program for suspicious or unusual activity that covers funds transfers and monetary instruments (such as travelers' checks, money orders, etc.)?	Y <input checked="" type="checkbox"/>	N <input type="checkbox"/>
<b>VI. AML Training</b>		
28. Does the FI provide AML training to relevant employees that include identification and reporting of transactions that must be reported to government authorities, examples of different forms of money laundering involving the FI's products and services and internal policies to prevent money laundering?	Y <input checked="" type="checkbox"/>	N <input type="checkbox"/>
29. Does the FI retain records of its training sessions including attendance records and relevant training materials used?	Y <input checked="" type="checkbox"/>	N <input type="checkbox"/>
30. Does the FI have policies to communicate new AML related laws or changes to existing AML related policies or practices to relevant employees?	Y <input checked="" type="checkbox"/>	N <input type="checkbox"/>

31. Does the FI employ agents to carry out some of the functions of the FI and if so does the FI provide AML training to relevant agents that includes identification and reporting of transactions that must be reported to government authorities, examples of different forms of money laundering involving the FI's products and services and internal policies to prevent money laundering?	Y <input checked="" type="checkbox"/>	N <input type="checkbox"/>
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**I confirm that I am authorized to complete this document:**

**Financial Institution Name: BANCA REALE SPA**

**Location: TORINO (ITALY)**

**Name: DOTT. GIORGIO MENTUCCIA**

**Position: COMPLIANCE OFFICER**

**Signature:** 

**Bank stamp:** 

**Date:**