the Wolfsberg Group

Financial Institution Name:

BANCO DI CREDITO P. AZZOAGLIO S.P.A.

Location (Country):

CEVA (CN) - ITALY

The questionnaire is required to be answered on a Legal Entity (LE) Level. The Financial Institution should answer the questionnaire at the legal entity level including any branches for which the client base, products and control model are materially similar to the LE Head Office. This questionnaire should not cover more than one LE. Each question in the CBDDQ will need to be addressed from the perspective of the LE and on behalf of all of its branches. If a response for the LE differs for one of its branches, this needs to be highlighted and details regarding this difference captured at the end of each sub-section. If a branch's business activity (products offered, client base etc.) is materially different than its Entity Head Office, a separate questionnaire can be completed for that branch.

No#	Question	Answer
1. ENTI	TY & OWNERSHIP	
1	Full Legal Name	BANCO DI CREDITO P.AZZOAGLIO S.P.A.
2	Append a list of foreign branches which are covered by this questionnaire	ALL OUR BRANCHES - see branches list on: https://www.azzoaglio.it/filiali
3	Full Legal (Registered) Address	VIA ANDREA DORIA N. 17 - 12073 - CEVA (CN) - ITALIA
4	Full Primary Business Address (if different from above)	
5	Date of Entity incorporation/ establishment	20/12/1977 per trasformazione di preesistente snc costituita il 20/06/1959
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	ERICA AZZOAGLIO, ELENA AZZOAGLIO, SOERIC SOCIETA' SEMPLICE, SOELEN SOCIETA' SEMPLICE.
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	Name of primary financial regulator / supervisory authority	BANCA D'ITALIA

10	Provide Legal Entity Identifier (LEI) if available	81560035485BD7DB3590
11	Provide the full legal name of the ultimate parent (if different from the Entity completing the DDQ)	
12	Jurisdiction of licensing authority and regulator of ultimate parent	BANCA D'ITALIA - TORINO - ITALY
13	Select the business areas applicable to the Entity	
13 a	Retail Banking	Yes
13 b	Private Banking / Wealth Management	No
13 с	Commercial Banking	Yes
13 d	Transactional Banking	Yes
13 e	Investment Banking	No
13 f	Financial Markets Trading	Yes
13 g	Securities Services / Custody	No
13 h	Broker / Dealer	No
13 i	Multilateral Development Bank	No
13 j	Other	
14	Does the Entity have a significant (10% or more) portfolio of non-resident customers or does it derive more than 10% of its revenue from non-resident customers? (Non-resident means customers primarily resident in a different jurisdiction to the location where bank services are provided.)	No
14 a	If Y, provide the top five countries where the non- resident customers are located.	
15	Select the closest value:	
15 a	Number of employees	51-200
15 b	Total Assets	Less than \$10 million
16	Confirm that all responses provided in the above Section ENTITY & OWNERSHIP are representative of all the LE's branches	Yes
16 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
16 b	If appropriate, provide any additional information / context to the answers in this section.	
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2. PRO	DUCTS & SERVICES	
17	Does the Entity offer the following products and services:	
17 a	Correspondent Banking	No
17 a1	If Y	
17 a2	Does the Entity offer Correspondent Banking services to domestic banks?	
17 a3	Does the Entity allow domestic bank clients to provide downstream relationships?	
17 a4	Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks?	
17 a5	Does the Entity offer correspondent banking services to Foreign Banks?	
17 a6	Does the Entity allow downstream relationships with Foreign Banks?	
17 a7	Does the Entity have processes and procedures in place to identify downstream relationships with Foreign Banks?	
17 a8	Does the Entity offer correspondent banking services to regulated MSBs/MVTS?	No
17 a9	Does the Entity allow downstream relationships with MSBs/MVTS?	
17 a10	Does the Entity have processes and procedures in place to identify downstream relationships with MSB /MVTS?	
17 b	Private Banking (domestic & international)	No
17 c	Trade Finance	Yes
17 d	Payable Through Accounts	No
17 e	Stored Value Instruments	No
17 f	Cross Border Bulk Cash Delivery	No
17 g	Domestic Bulk Cash Delivery	No
17 h	International Cash Letter	Yes
17 i	Remote Deposit Capture	No
17 j	Virtual /Digital Currencies	No
17 k	Low Price Securities	No
17 I	Hold Mail	No
17 m	Cross Border Remittances	Yes
17 n	Service to walk-in customers (non-account holders)	No
17 o	Sponsoring Private ATMs	No
17 p	Other high risk products and services identified by the Entity	NONE
18	Confirm that all responses provided in the above Section PRODUCTS & SERVICES are representative of all the LE's branches	Yes
18 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
18 b	If appropriate, provide any additional information / context to the answers in this section.	
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3 AMI	, CTF & SANCTIONS PROGRAMME	
3. AIVIL	<u></u>	
19	Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:	
19 a	Appointed Officer with sufficient experience/expertise	Yes
19 b	Cash Reporting	Yes
19 с	CDD	Yes
19 d	EDD	Yes
19 e	Beneficial Ownership	Yes
19 f	Independent Testing	Yes
19 g	Periodic Review	Yes
19 h	Policies and Procedures	Yes
19 i	Risk Assessment	Yes
19 j	Sanctions	Yes
19 k	PEP Screening	Yes
19 I	Adverse Information Screening	Yes
19 m	Suspicious Activity Reporting	Yes
19 n	Training and Education	Yes
19 о	Transaction Monitoring	Yes
20	How many full time employees are in the Entity's AML, CTF & Sanctions Compliance Department?	Less than 10
21	Is the Entity's AML, CTF & Sanctions policy approved at least annually by the Board or equivalent Senior Management Committee?	Yes
22	Does the Board or equivalent Senior Management Committee receive regular reporting on the status of the AML, CTF & Sanctions programme?	Half-Annually/Every six months
23	Does the Entity use third parties to carry out any components of its AML, CTF & Sanctions programme?	No
23 a	If Y, provide further details	
24	Confirm that all responses provided in the above Section AML, CTF & SANCTIONS Programme are representative of all the LE's branches	Yes
24 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
24 b	If appropriate, provide any additional information / context to the answers in this section.	

4. ANT	I BRIBERY & CORRUPTION	
25	Has the Entity documented policies and procedures consistent with applicable ABC regulations and requirements to [reasonably] prevent, detect and report bribery and corruption?	Yes
26	Does the Entity have an enterprise wide programme that sets minimum ABC standards?	Yes
27	Has the Entity appointed a designated officer or officers with sufficient experience/expertise responsible for coordinating the ABC programme?	Yes
28	Does the Entity have adequate staff with appropriate levels of experience/expertise to implement the ABC programme?	Yes
29	Is the Entity's ABC programme applicable to:	Third parties acting on behalf of the Entity
30	Does the Entity have a global ABC policy that:	
30 a	Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage	Yes
30 b	Includes enhanced requirements regarding interaction with public officials?	Yes
30 с	Includes a prohibition against the falsification of books and records (this may be within the ABC policy or any other policy applicable to the Legal Entity)?	Yes
31	Does the Entity have controls in place to monitor the effectiveness of their ABC programme?	Yes
32	Does the Entity's Board or Senior Management Committee receive regular Management Information on ABC matters?	Yes
33	Does the Entity perform an Enterprise Wide ABC risk assessment?	Yes
33 a	If Y select the frequency	12 Months
34	Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment?	Yes
35	Does the Entity's ABC EWRA cover the inherent risk components detailed below:	
35 a	Potential liability created by intermediaries and other third-party providers as appropriate	Yes
35 b	Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries	Yes
35 с	Transactions, products or services, including those that involve state-owned or state-controlled entities or public officials	Yes
35 d	Corruption risks associated with gifts and hospitality, hiring/internships, charitable donations and political contributions	Yes
35 e	Changes in business activities that may materially increase the Entity's corruption risk	Yes
36	Does the Entity's internal audit function or other independent third party cover ABC Policies and Procedures?	Yes

Does the Entity provide mandatory ABC training to:	
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 outsourced	No
Non-employed workers as appropriate (contractors/consultants)	Yes
Does the Entity provide ABC training that is targeted to specific roles, responsibilities and activities?	Yes
Confirm that all responses provided in the above Section Anti Bribery & Corruption are representative of all the LE's branches	Yes
If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
If appropriate, provide any additional information / context to the answers in this section.	
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17	Does the Entity's AML & CTF EWRA cover the	
••	inherent risk components detailed below:	
17 a	Client	Yes
17 b	Product	Yes
17 c	Channel	Yes
17 d	Geography	Yes
18	Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below:	
18 a	Transaction Monitoring	Yes
18 b	Customer Due Diligence	Yes
18 c	PEP Identification	Yes
18 d	Transaction Screening	Yes
18 e	Name Screening against Adverse Media & Negative News	Yes
18 f	Training and Education	Yes
18 g	Governance	Yes
18 h	Management Information	Yes
19	Has the Entity's AML & CTF EWRA been completed in the last 12 months?	Yes
19 a	If N, provide the date when the last AML & CTF EWRA was completed.	
50	Does the Entity's Sanctions EWRA cover the inherent risk components detailed below:	
50 a	Client	Yes
50 b	Product	Yes
50 c	Channel	Yes
50 d	Geography	Yes

51	Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below:	
51 a	Customer Due Diligence	Yes
51 b	Transaction Screening	Yes
51 c	Name Screening	Yes
51 d	List Management	Yes
51 e	Training and Education	Yes
51 f	Governance	Yes
51 g	Management Information	Yes
52	Has the Entity's Sanctions EWRA been completed in the last 12 months?	Yes
52 a	If N, provide the date when the last Sanctions EWRA was completed.	
53	Confirm that all responses provided in the above Section AML, CTF & SANCTIONS RISK ASSESSMENT are representative of all the LE's branches	Yes
53 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
53 b	If appropriate, provide any additional information / context to the answers in this section.	

7. KYC	C, CDD and EDD	
54	Does the Entity verify the identity of the customer?	Yes
55	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
56	Which of the following does the Entity gather and retain when conducting CDD? Select all that apply:	
56 a	Ownership structure	Yes
56 b	Customer identification	Yes
56 c	Expected activity	Yes
56 d	Nature of business/employment	Yes
56 e	Product usage	Yes
56 f	Purpose and nature of relationship	Yes
56 g	Source of funds	Yes
56 h	Source of wealth	Yes
57	Are each of the following identified:	
57 a	Ultimate beneficial ownership	Yes
57 a1	Are ultimate beneficial owners verified?	Yes
57 b	Authorised signatories (where applicable)	Yes
57 c	Key controllers	Yes
57 d	Other relevant parties	
58	What is the Entity's minimum (lowest) threshold applied to beneficial ownership identification?	25%
59	Does the due diligence process result in customers receiving a risk classification?	Yes

60	If Y, what factors/criteria are used to determine the customer's risk classification? Select all that apply:	
60 a	Product Usage	Yes
60 b	Geography	Yes
60 c	Business Type/Industry	Yes
60 d	Legal Entity type	Yes
60 e	Adverse Information	Yes
60 f	Other (specify)	media notice
61	Does the Entity have a risk based approach to screening customers for adverse media/negative news?	Yes
62	If Y, is this at:	
62 a	Onboarding	Yes
62 b	KYC renewal	Yes
62 c	Trigger event	Yes
63	What is the method used by the Entity to screen for adverse media / negative news?	Combination of automated and manual
64	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
65	If Y, is this at:	
65 a	Onboarding	Yes
65 b	KYC renewal	Yes
65 c	Trigger event	Yes
66	What is the method used by the Entity to screen PEPs?	Combination of automated and manual
67	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
68	Does the Entity have a process to review and update customer information based on:	
68 a	KYC renewal	Yes
68 b	Trigger event	Yes
69	Does the Entity maintain and report metrics on current and past periodic or trigger event due diligence reviews?	Yes

70	From the list below, which categories of customers or industries are subject to EDD and/or are restricted, or prohibited by the Entity's	
70 a	FCC programme? Non-account customers	EDD on a risk based approach
70 b	Non-resident customers	EDD on a risk based approach
70 c	Shell banks	Prohibited
70 d	MVTS/ MSB customers	EDD on a risk based approach
70 e	PEPs	EDD on a risk based approach
70 f	PEP Related	EDD on a risk based approach
70 g	PEP Close Associate	EDD on a risk based approach
70 h	Correspondent Banks	EDD on a risk based approach
70 h1	If EDD or EDD & restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2014?	Yes
70 i	Arms, defense, military	Prohibited
70 j	Atomic power	Prohibited
70 k	Extractive industries	EDD on a risk based approach
70 I	Precious metals and stones	EDD on a risk based approach
70 m	Unregulated charities	EDD & restricted on a risk based approach
70 n	Regulated charities	EDD on a risk based approach
70 o	Red light business / Adult entertainment	Prohibited
70 p	Non-Government Organisations	EDD on a risk based approach
70 q	Virtual currencies	Prohibited
70 r	Marijuana	Prohibited
70 s	Embassies/Consulates	EDD on a risk based approach
70 t	Gambling	EDD on a risk based approach
70 u	Payment Service Provider	EDD & restricted on a risk based approach
70 v	Other (specify)	
71	If restricted, provide details of the restriction	Proibithed by internal Policis Approval by senior management is required (ex PEP)
72	Does the Entity perform an additional control or quality review on clients subject to EDD?	Yes
73	Confirm that all responses provided in the above Section KYC, CDD and EDD are representative of all the LE's branches	Yes
73 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to	
73 b	If appropriate, provide any additional information / context to the answers in this section.	

8. MO	NITORING & REPORTING	
74	Does the Entity have risk based policies, procedures and monitoring processes for the identification and reporting of suspicious activity?	Yes
75	What is the method used by the Entity to monitor transactions for suspicious activities?	Automated
76	If manual or combination selected, specify what type of transactions are monitored manually	payment blockedby swift sanction Screening Program
77	Does the Entity have regulatory requirements to report suspicious transactions?	Yes
77 a	If Y, does the Entity have policies, procedures and processes to comply with suspicious transaction reporting requirements?	Yes
78	Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity?	Yes
79	Confirm that all responses provided in the above Section MONITORING & REPORTING are representative of all the LE's branches	Yes
79 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to	
79 b	If appropriate, provide any additional information / context to the answers in this section.	

MENT TRANSPARENCY	
Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards?	Yes
Does the Entity have policies, procedures and processes to [reasonably] comply with and have controls in place to ensure compliance with:	
FATF Recommendation 16	Yes
Local Regulations	Yes
Specify the regulation	Regulation UE 2015/847 Legislative decree 231/07 modified by Legislative decree 90/2017 and Legislative decree 125/2019
If N, explain	
Does the Entity have processes in place to respond to Request For Information (RFIs) from other entities in a timely manner?	Yes
Does the Entity have controls to support the inclusion of required and accurate originator information in international payment messages?	Yes
Does the Entity have controls to support the inclusion of required beneficiary information international payment messages?	Yes
Confirm that all responses provided in the above Section PAYMENT TRANSPARENCY are representative of all the LE's branches	Yes
If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
If appropriate, provide any additional information / context to the answers in this section.	
	Payment Transparency Standards? Does the Entity have policies, procedures and processes to [reasonably] comply with and have controls in place to ensure compliance with: FATF Recommendation 16 Local Regulations Specify the regulation If N, explain Does the Entity have processes in place to respond to Request For Information (RFIs) from other entities in a timely manner? Does the Entity have controls to support the inclusion of required and accurate originator information in international payment messages? Does the Entity have controls to support the inclusion of required beneficiary information international payment messages? Confirm that all responses provided in the above Section PAYMENT TRANSPARENCY are representative of all the LE's branches If N, clarify which questions the difference/s relate to and the branch/es that this applies to.

86 Does the Entity have a Sanctions Policy approved by management regarding compliance with sanctions law applicable to the Entity, including with respect its business conducted with, or through accounts held at foreign financial institutions? 87 Does the Entity have policies, procedures, or other controls reasonably designed to prevent the use of another entity is accounts or services in a manner causing the other entity to violate sanctions prohibitions applicable to the entity to scall jurisdiction? 88 Does the Entity have policies, procedures or other cornorios 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? 89 Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during orboarding and regularly thereafter against Sanctions Lists? 90 What is the method used by the Entity? 91 Does the Entity screen all sanctions relevant data, including at a minimum, entity and location information, contained in cross border transactions against Sanctions Lists? 92 What is the method used by the Entity? 93 Select the Sanctions Lists of the Entity of the Sanctions against Sanctions Lists? 94 What is the method used by the Entity in its sanctions screening processes: 95 a Consolidated United Nations Security Council Sanctions List (W) 95 b United States Department of the Treasury's Office of Financial Sanctions Injeriementation HMT (OFSI) 96 Coffice of Financial Sanctions implementation HMT (OFSI) 97 office of Financial Sanctions implementation HMT (OFSI) 98 d Cuestion removed 99 When regulatory suthorities make updates to their Sanctions list, how many business days before the entity updates their active manual and/or automated screening systems against:	
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their Sanctions list, how many business days before the entity updates their active manual and/ or automated screening systems against:	
lan la	
95 a Customer Data Within 3 to 5 business days	
95 b Transactions Within 3 to 5 business days	

Wolfsberg Group Correspondent Banking Due Diligence Questionnaire (CBDDQ) V1.3

	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
	Confirm that all responses provided in the above Section SANCTIONS are representative of all the LE's branches	Yes
	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
97 b	If appropriate, provide any additional information / context to the answers in this section.	

11. TR	AINING & EDUCATION	
98	Does the Entity provide mandatory training, which includes :	
98 a	Identification and reporting of transactions to government authorities	Yes
98 b	Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered	Yes
98 c	Internal policies for controlling money laundering, terrorist financing and sanctions violations	Yes
98 d	New issues that occur in the market, e.g., significant regulatory actions or new regulations	Yes
98 e	Conduct and Culture	Yes
99	Is the above mandatory training provided to :	
99 a	Board and Senior Committee Management	Yes
99 b	1st Line of Defence	Yes
99 с	2nd Line of Defence	Yes
99 d	3rd Line of Defence	Yes
99 e	3rd parties to which specific FCC activities have been outsourced	Not Applicable
99 f	Non-employed workers (contractors/consultants)	Yes
100	Does the Entity provide AML, CTF & Sanctions training that is targeted to specific roles, responsibilities and high risk products, services and activities?	Yes
101	Does the Entity provide customised training for AML, CTF and Sanctions staff?	Yes
102	Confirm that all responses provided in the above Section TRAINING & EDUCATION are representative of all the LE's branches	Yes
102 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
102 b	If appropriate, provide any additional information / context to the answers in this section.	
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	ALITY ASSURANCE /COMPLIANCE TEST	
103	Are the Entity's KYC processes and documents subject to quality assurance testing?	Yes
104	Does the Entity have a program wide risk based Compliance Testing process (separate to the independent Audit function)?	Yes
105	Confirm that all responses provided in the above Section QUALITY ASSURANCE / COMPLIANCE TESTING are representative of all the LE's branches	Yes
105 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
105 b	If appropriate, provide any additional information / context to the answers in this section.	

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? How often is the Entity audited on its AML, CTF & Sanctions programme by the following: Internal Audit Department External Third Party Does the internal audit function or other independent third party cover the following areas: AML, CTF & Sanctions policy and procedures KYC / CDD / EDD and underlying methodologies	Yearly Yearly Yes
& Sanctions programme by the following: Internal Audit Department External Third Party Does the internal audit function or other independent third party cover the following areas: AML, CTF & Sanctions policy and procedures KYC / CDD / EDD and underlying	Yearly
External Third Party Does the internal audit function or other independent third party cover the following areas: AML, CTF & Sanctions policy and procedures KYC / CDD / EDD and underlying	Yearly
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independent third party cover the following areas: AML, CTF & Sanctions policy and procedures KYC / CDD / EDD and underlying	Yes
KYC / CDD / EDD and underlying	Yes
, ,	
	Yes
Transaction Monitoring	Yes
Transaction Screening including for sanctions	Yes
Name Screening & List Management	Yes
Training & Education	Yes
Technology	Yes
Governance	Yes
Reporting/Metrics & Management Information	Yes
Suspicious Activity Filing	Yes
Enterprise Wide Risk Assessment	Yes
Other (specify)	
Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness?	Yes
Confirm that all responses provided in the above section, AUDIT are representative of all the LE's branches	Yes
If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
If appropriate, provide any additional information / context to the answers in this section.	
	Training & Education Technology Governance Reporting/Metrics & Management Information Suspicious Activity Filing Enterprise Wide Risk Assessment Other (specify) Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness? Confirm that all responses provided in the above section, AUDIT are representative of all the LE's branches If N, clarify which questions the difference/s relate to and the branch/es that this applies to.

Declaration Statement

Wolfsberg Group Correspondent Banking Due Diligence Questionnaire 2020 (CBDDQ V1.3)

Declaration Statement (To be signed by Global Head of Correspondent Banking or equivalent position holder AND Group Money Laundering Prevention Officer, Global Head of Anti- Money Laundering, Chief Compliance Officer, Global Head of Financial Crimes Compliance OR equivalent)

BANCO DI CREDITO P. AZZOAGLIO S.P.A.

(Financial Institution name) is fully committed to the fight against financial crime and makes

every effort to remain in full compliance with all applicable financial crime laws, regulations and standards in all of the jurisdictions in which it does business and holds accounts.

The Financial Institution understands the critical importance of having effective and sustainable controls to combat financial crime in order to protect its reputation and to meet its egal and regulatory obligations.

The Financial Institution recognises the importance of transparency regarding parties to transactions in international payments and has adopted/is committed to adopting these

The Financial Institution further certifies it complies with / is working to comply with the Wolfsberg Correspondent Banking Principles and the Wolfsberg Trade Finance Principles. The information provided in thisWolfsberg CBDDQ will be kept current and will be updated no less frequently than on an annual basis.

The Financial Institution commits to file accurate supplemental information on a timely basis.

AZZOAGLIO ERICA

(Global Head of Correspondent Banking or equivalent), certify that I have read and understood this declaration, that the answers provided in this Wolfsberg CBDDQ are complete and correct to my honest belief, and that I am authorised to execute this declaration on behalf of the Financial Institution.

ALESSANDRIA GIORGIA

(MLRO or equivalent), certify that I have read and understood this declaration, that the answers provided in this Wolfsberg CBDDQ are complete and correct to my honest belief, and that I am authorised to execute this declaration on behalf of the Financial Institution.

07/10/2024

(Signature & Date)

07/10/2024

(Signature & Date)