

Firenze, 10th June 2021

## MPS CAPITAL SERVICES BANCA PER LE IMPRESE S.p.A.

### AML Declaration

#### GENERAL INFORMATION

Company: MPS Capital Services Banca per le Imprese S.p.A.  
Registered office: Via Leone Pancaldo, 4 - 50127 Firenze  
Tax code and Corporate Register Number in C.C.I.A.A. (Commerce Register) of Firenze: 00816350482 - VAT Group MPS: VAT number 01483500524  
Phone numbers: +39 055 24981 Fax: + 39 055 242750  
Web site: [www.mpscapitalservices.it](http://www.mpscapitalservices.it)  
(english version: <https://www.mpscapitalservices.it/en/>)  
SWIFT code: PASCIT MM FIR

MPS Capital Services (MPS CS) is the Corporate and Investment Bank of Monte dei Paschi di Siena Group and it was established in 2007 through the integration of MPS Finance, a highly reputed Investment Bank, and MPS Banca per l'Impresa Spa, a leading Italian Bank for project finance, corporate finance and special lending.

The Clients/Counterparties of MPS CS are Financial Institutions (in Italy and Abroad), Corporates (mainly Italian), Local Authorities (Italian).

MPS CS provides a wide range of financial services for Foreign Institutions (Banks, Asset /Fund Managers, Insurance Companies, Brokers) through highly skilled professionals.

MPS CS holds a prominent position in the Italian Fixed Income primary market and is among the Italian leaders in the Credit Trading on the Secondary Market

MPS CS operates under license of Bank of Italy, in accordance with the current regulatory framework, internal Policies and Procedures aimed at ensuring compliance with all domestic and EU applicable legislations and the Code of Ethics of Montepaschi Group. Its financial statements are formally audited.

The Parent Company, Monte dei Paschi di Siena Bank S.p.A., is quoted on the Milan Stock Exchange and its financial statements are formally audited.

#### ANTI-MONEY LAUNDERING IN ITALY. LAWS AND REGULATIONS ISSUED TO COMBAT MONEY LAUNDERING AND TERRORISM FINANCING

Anti-Money Laundering (AML) and Counter Terrorism Financing (CTF) regulatory framework is based on a comprehensive set of national, EU and international regulatory sources.

EU guidelines on preventing the use of the financial system for money laundering and terrorism financing are contained in EU Directive 2015/849 of the European Parliament and of the Council dated May 20<sup>th</sup> 2015 (Fourth Anti-Money Laundering Directive), implemented by EU Directive 2018/843 (Fifth Anti-Money Laundering Directive).

At a national level, prevention and fight against money laundering and terrorism financing are regulated by the following primary laws:

- Italian Legislative Decree no. 109 of 22 June 2007 which sets forth “Provisions to prevent, counter and repress the financing of terrorism and the activity of Countries that threaten peace and international security”, as modified by Legislative Decree 90/2017 which implemented Directive 2015/849/EU.
- Italian Legislative Decree no. 231 of 21 November 2007, transposing EU Directive 2015/849 of the European Parliament and of the Council of 20 May 2015 (Fourth Anti-Money Laundering Directive) and EU Directive 2018/843 (Fifth Anti-Money Laundering Directive, as modified by Legislative Decree 90/2017 which implemented Directive 2015/849/EU and by Legislative Decree 125/2019 which implemented Directive 2018/843/EU.

The Montepaschi Group has transposed these decrees in its internal regulatory documents.

The Bank, on its activities of prevention and countering of money laundering and terrorism financing, is subject to the constant review by its domestic and European Regulators, respectively the Bank of Italy and the European Central Bank.

#### **BMPS GROUP POLICY ON PREVENTION OF MONEY LAUNDERING AND TERRORISM FINANCING**

AML Function (Anti-Money Laundering) has been totally outsourced to the parent Company, BMPS. MPS Group has chosen for the Italian subsidiaries a centralized model. The Head of Anti-Money Laundering is the Head of the Chief Risk Officer, who reports to the Board of Directors directly.

The Montepaschi Group has adopted an AML-CTF Policy as a reflection of its commitment to countering the criminal activities related to money laundering and terrorism financing. Particular attention is given to all AML and CTF measures while considering that the pursuit of profitability and efficiency should always go hand in hand with the effort to effectively ensure the company's integrity.

This global Anti-Money Laundering and Counter Terrorism Financing Policy applies to the Montepaschi Group at an Enterprise level and describes the policies adopted by the Group in accordance with the rules and principles established by national and EU regulations, in compliance with AML-CTF international standards.

The Policy is published on the Group website: [AML-CFT - Banca MPS - ENG \(gruppomps.it\)](http://www.gruppomps.it)  
[www.gruppomps.it](http://www.gruppomps.it).

#### **BMPS GROUP MONEY-LAUNDERING AND TERRORISM FINANCING RISK MANAGEMENT**

To mitigate the risk of non-compliance with anti-money laundering and counter-terrorism financing requirements, the Group adopted a procedure that involves the following activities:

- Identifying the risk of non-compliance with AML-CTF requirements;
- Gap analysis and assessing the status of compliance;

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Sede Legale: Via Leone Pancaldo n. 4, - 50127 FIRENZE - Direzione Generale: Via Panciatichi, 48 - 50127 FIRENZE - [www.mpscapitalservices.it](http://www.mpscapitalservices.it) - Tel. 055.24981 Fax 055.240826 Capitale sociale Euro 1.517.076.384,31 i.v., Codice Fiscale e N. Iscr. Reg. Imp. di Firenze 00816350482, GRUPPO IVA MPS - Partita IVA 01483500524, Società con socio unico soggetta all'attività di direzione e coordinamento da parte della Banca Monte dei Paschi di Siena S.p.A., appartenente al Gruppo Bancario Monte dei Paschi di Siena - Codice ABI Banca 10643.5 - Codice ABI Gruppo 1030.6 - Aderente al Codice di comportamento del settore bancario e finanziario - Aderente al Fondo Interbancario di Tutela dei Depositi ed al Fondo Nazionale di Garanzia - Iscritta all'Albo delle Banche della Banca d'Italia n. 4770.

- Management and mitigation of AML-CTF risks;
- Compliance controls (ex-ante and ex-post);
- Advisory and support to Management and branches network on AML-CTF issues;
- On-going AML-CTF risks monitoring and control;
- Specific reporting to top management, governing bodies, supervisory bodies and regulators;
- Structuring and provision of specific AML-CTF training courses.

### THE BOARD OF STATUTORY AUDITORS

The Board of Statutory Auditors supervises, within its powers and responsibilities, the functionality and adequacy of the internal control systems and procedures regarding anti-money laundering and terrorism financing regulations and, in particular, with the reporting obligations of suspicious activity. The Board of Statutory Auditors, through the Internal Audit Department, periodically verifies the functionality and efficiency of the AML-CTF procedures and assesses the validity of the entire system.

The Supervisory Committee pursuant to Legislative Decree No. 231/01 (appointed by the Board of Directors) contributes to the definition of the organizational model to prevent crimes that may determine a liability to the Bank due to administrative offences linked to money laundering crimes, terrorism financing and the use of money, goods or benefits of unlawful origin.

For any further information on please see:

<https://www.mpscapitalservices.it/en/corporate-details.html>

**MPS Capital Services Banca per le Imprese S.p.A.**  
**Gruppo Monte dei Paschi di Siena**

**Head of AML-CFT - Leonardo Bellucci**

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