

Financial Institution Name: MPS CAPITAL SERVICES BANCA PER LE IMPRESE S.p.A.

Location: Via L. Pancaldo 4, 50127 Firenze (ITALY)

Anti-Money Laundering Questionnaire

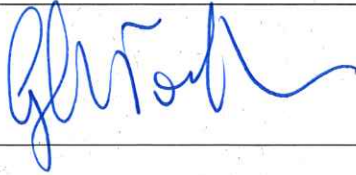
If you answer "no" to any question, additional information can be supplied at the end of the questionnaire.

I. General AML Policies, Practices and Procedures:	<u>Yes</u>	<u>No</u>
1. Is the AML compliance program approved by the FI's board or a senior committee?	■	
2. Does the FI have a legal and regulatory compliance program that includes a designated officer that is responsible for coordinating and overseeing the AML framework?	■	
3. Has the FI developed written policies documenting the processes that they have in place to prevent, detect and report suspicious transactions?	■	
4. 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?	■	
5. Does the FI have a policy prohibiting accounts/relationships with shell banks? (<i>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.</i>)	■	
6. 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?	■	
7. Does the FI have policies covering relationships with Politically Exposed Persons (PEP's), their family and close associates?	■	
8. Does the FI have record retention procedures that comply with applicable law?	■	
9. Are the FI's AML policies and practices being applied to all branches and subsidiaries of the FI both in the home country and in locations outside of that jurisdiction?	■	
II. Risk Assessment	<u>Yes</u>	<u>No</u>
10. Does the FI have a risk-based assessment of its customer base and their transactions?	■	
11. 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?	■	
III. Know Your Customer, Due Diligence and Enhanced Due Diligence	<u>Yes</u>	<u>No</u>
12. Has the FI implemented processes for the identification of those customers on whose behalf it maintains or operates accounts or conducts transactions?	■	

13. Does the FI have a requirement to collect information regarding its customers' business activities?	<input type="checkbox"/>	
14. Does the FI assess its FI customers' AML policies or practices?	<input type="checkbox"/>	
15. Does the FI have a process to review and, where appropriate, update customer information relating to high risk client information?	<input type="checkbox"/>	
16. Does the FI have procedures to establish a record for each new customer noting their respective identification documents and 'Know Your Customer' information?	<input type="checkbox"/>	
17. Does the FI complete a risk-based assessment to understand the normal and expected transactions of its customers?	<input type="checkbox"/>	
IV. Reportable Transactions and Prevention and Detection of Transactions with Illegally Obtained Funds	<u>Yes</u>	<u>No</u>
18. Does the FI have policies or practices for the identification and reporting of transactions that are required to be reported to the authorities?	<input type="checkbox"/>	
19. Where cash transaction reporting is mandatory, does the FI have procedures to identify transactions structured to avoid such obligations?	<input type="checkbox"/>	
20. Does the FI screen customers and transactions against lists of persons, entities or countries issued by government/competent authorities?	<input type="checkbox"/>	
21. 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?	<input type="checkbox"/>	
22. Does the FI adhere to the Wolfsberg Transparency Principles and the appropriate usage of the SWIFT MT 202/202COV and MT 205/205COV message formats? ¹	<input type="checkbox"/>	
V. Transaction Monitoring	<u>Yes</u>	<u>No</u>
23. Does the FI have a monitoring program for unusual and potentially suspicious activity that covers funds transfers and monetary instruments such as travelers checks, money orders, etc?	<input type="checkbox"/>	
VI. AML Training	<u>Yes</u>	<u>No</u>
24. Does the FI provide AML training to relevant employees that includes: <ul style="list-style-type: none"> ▪ 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. ▪ Internal policies to prevent money laundering. 	<input type="checkbox"/>	

¹ The four payment message standards to be observed are: (I) FIs should not omit, delete, or alter information in payment messages or orders for the purpose of avoiding detection of that information by any other FI in the payment process; (II) FIs should not use any particular payment message for the purpose of avoiding detection of information by any other FI in the payment process; (III) Subject to applicable laws, FIs should cooperate as fully as practicable with other FIs in the payment process when requesting to provide information about the parties involved; (IV) FIs should strongly encourage their correspondent banks to observe these principles.

25. Does the FI retain records of its training sessions including attendance records and relevant training materials used?	■	
26. Does the FI communicate new AML related laws or changes to existing AML related policies or practices to relevant employees?	■	
27. Does the FI employ third parties to carry out some of the functions of the FI?	■	
28. If the answer to question 27 is yes, does the FI provide AML training to relevant third parties that includes: <ul style="list-style-type: none"> ▪ 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. ▪ Internal policies to prevent money laundering. 	■	

Name: Mr. GIANLUCA TORTORA	
Title: AML HEAD OFFICER	
Signature:	
Signed by Mr. GIANLUCA TORTORA	
Date: 24/01/2018	

