



Financial Institution Name:

BANCA MACERATA SPA

Location (Country) :

ITALY

No #	Question	Answer
<b>1. ENTITY &amp; OWNERSHIP</b>		
1	Full Legal name	BANCA MACERATA SPA
2	Append a list of branches which are covered by this questionnaire	This questionnaire is only valid for Banca Macerata Spa
3	Full Legal (Registered) Address	via Carducci, 67 62010 - Macerata Italy
4	Full Primary Business Address (if different from above)	
5	Date of Entity incorporation / establishment	established on 11/01/2006
6	Select type of ownership and append an ownership chart if available	
6 a	Publicly Traded (25% of shares publicly traded)	Yes
6 a1	If Y, indicate the exchange traded on and ticker symbol	Hi-Mtf Order Driven ( <a href="http://www.himtf.com/">http://www.himtf.com/</a> - isin: IT0005329419)
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	No shareholder or ultimate beneficial owners whit a holding of 10% or more
7	% of the Entity's total shares composed of bearer shares	None
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
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	The Bank has one own sales network made up from Personal Financial Advisors and provides them AML training. It also employs others F.I. to sell mortgage loans and salary loans and to carry out the related CDD activities: at this purpose provides its ALM policy-CDD/EDD instructions-questionnaire to these third parties.

**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	No
14 f	Non-employed workers as appropriate (contractors / consultants)	Yes

**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	Yes
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	
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
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	None of the above
27 b	Offshore customers	Prohibited

**4. POLICIES & PROCEDURES**

<b>15</b>	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report:	
<b>15 a</b>	Money laundering	Yes
<b>15 b</b>	Terrorist financing	Yes
<b>15 c</b>	Sanctions violations	Yes
<b>16</b>	Does the Entity have policies and procedures that:	
<b>16 a</b>	Prohibit the opening and keeping of anonymous and fictitious named accounts	Yes
<b>16 b</b>	Prohibit the opening and keeping of accounts for unlicensed banks and / or NBFIs	Yes
<b>16 c</b>	Prohibit dealing with other entities that provide banking services to unlicensed banks	Yes
<b>16 d</b>	Prohibit accounts / relationships with shell banks	Yes
<b>16 e</b>	Prohibit dealing with another Entity that provides services to shell banks	Yes
<b>16 f</b>	Prohibit opening and keeping of accounts for Section 311 designated entities	Yes
<b>16 g</b>	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
<b>16 h</b>	Assess the risks of relationships with PEPs, including their family and close associates	Yes
<b>16 i</b>	Define escalation processes for financial crime risk issues	Yes
<b>16 j</b>	Specify how potentially suspicious activity identified by employees is to be escalated and investigated	Yes
<b>16 k</b>	Outline the processes regarding screening for sanctions, PEPs and negative media	Yes
<b>17</b>	Has the Entity defined a risk tolerance statement or similar document which defines a risk boundary around their business?	Yes
<b>18</b>	Does the Entity have a record retention procedures that comply with applicable laws?	Yes
<b>18 a</b>	If Y, what is the retention period?	5 years or more

27 c	Shell banks	Prohibited
27 d	MVTS/ MSB customers	EDD & Restricted on a risk based approach
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	Prohibited
27 j	Atomic power	Prohibited
27 k	Extractive industries	EDD & Restricted on a risk based approach
27 l	Precious metals and stones	EDD & Restricted on a risk based approach
27 m	Unregulated charities	None of the above
27 n	Regulated charities	None of the above
27 o	Red light business / Adult entertainment	Prohibited
27 p	Non-Government Organisations	EDD on a risk based approach
27 q	Virtual currencies	Prohibited
27 r	Marijuana	Prohibited
27 s	Embassies / Consulates	EDD & Restricted on a risk based approach
27 t	Gambling	Prohibited
27 u	Payment Service Provider	EDD on a risk based approach
27 v	Other (specify)	
28	If restricted, provide details of the restriction	According to our ethical code. With reference to 27s, restrictions depend on international and European Sanctions.

**6. MONITORING & REPORTING**

<b>29</b>	Does the Entity have risk based policies, procedures and monitoring processes for the identification and reporting of suspicious activity?	Yes
<b>30</b>	What is the method used by the Entity to monitor transactions for suspicious activities?	
<b>30 a</b>	Automated	Yes
<b>30 b</b>	Manual	Yes
<b>30 c</b>	Combination of automated and manual	Yes
<b>31</b>	Does the Entity have regulatory requirements to report currency transactions?	Yes
<b>31 a</b>	If Y, does the Entity have policies, procedures and processes to comply with currency reporting requirements?	Yes
<b>32</b>	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**

<b>33</b>	Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards?	Yes
<b>34</b>	Does the Entity have policies, procedures and processes to [reasonably] comply with and have controls in place to ensure compliance with:	
<b>34 a</b>	FATF Recommendation 16	Yes
<b>34 b</b>	Local Regulations	Yes
<b>34 b1</b>	Specify the regulation	Eu Directive 849/2015 - Italian Law Decree 90/20017 - Italian Decree 231/2007 - Eur Reg. 847/2015
<b>34 c</b>	If N, explain	

**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 and for filtering transactional data
37 b	United States Department of the Treasury's Office of Foreign Assets Control (OFAC)	Used for screening customers and beneficial owners and for filtering transactional data
37 c	Office of Financial Sanctions Implementation HMT (OFSI)	Used for screening customers and beneficial owners and for filtering transactional data
37 d	European Union Consolidated List (EU)	Used for screening customers and beneficial owners and for filtering transactional data
37 e	Other (specify)	The Bank uses the World Check List
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)	No

**10. AUDIT**

41	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?	Yes
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**Date: March 8th, 2019**

**Name: DAVIDE MARZIALI**

**Title: ANTI MONEY LAUNDERING OFFICE MANAGER**

**Signature:**

*Davide Marziali*

**Name: FERDINANDO CAVALLINI**

**Title: CHAIRMAN OF THE BOARD OF DIRECTORS**

**Signature:**

*Cavallini*