

Know Your Customer (KYC) & Anti Money Laundering (AML) Questionnaire

General Information

Legal name of institution	<i>BANCA DI BOLOGNA</i>
Principal place of business (address)	<i>Piazza Galvani, 4 – 40124 BOLOGNA ITALY</i>
Branches and localization	<i>All branches located in province of Bologna. No branches abroad</i>
Jurisdiction of local licensing authority and regulator	<i>BANCA D'ITALIA</i>
Regulatory Authority responsible for anti-money laundering supervision of Institution	<i>BANCA D'ITALIA</i>
For information gathering and data communication, please contact:	<i>Pini Ugolini Gianfranco – Legal Service – e-mail address g.pini@bancadibologna.it Marchi Susi – Organization Service – e- mail address s.marchi@bancadibologna.it</i>
Website	<i>www.bancadibologna.it</i>
Swift BIC	<i>BDBOIT22</i>
Nature of securities representing the capital	<i>Shares not listed in any Stock Exchange</i>
Conditions for exercising voting rights	<i>One vote per shareholder</i>

Business Activity

Principal types of financial products and services offered to Institution's client base and geographical markets covered	A large range of banking products is provided mostly to Italian customers
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AML & KYC Controls

Does your country adhere to the 40 anti-money laundering recommendations and eight special anti-terrorist financing recommendations developed by the Financial Action Task force (FAFT) ?	YES
BANK'S AML/ATF POLICIES, PROCEDURES AND CONTROLS	
Do your institution's anti-money laundering and special anti-terrorist financing policies, procedures, and controls include:	
a) A "Know Your Customer" identification process when an account is opened which includes:	YES
1) Identification of each customer using independent verifiable sources ?	YES
2) Identification of each beneficial owner, including ownership and control structure of the customer where applicable ?	YES
3) Establishing and, on an ongoing basis, conducting customer due diligence and maintaining records in accordance with applicable regulations ?	YES
4) Information regarding the purpose and nature of the business relationship ?	YES
5) Ongoing due diligence of the business relationship and scrutiny of transactions undertaken to ensure that they are consistent with the profile of that customer ?	YES
6) Establishing enhanced due diligence programmes with respect to dealings with individuals, companies and institutions located in or dealing with higher risk ?	YES
7) Provisions to address risks related to non-face-to-face business relationships and the use of intermediaries and other third party sources of business ?	YES
b) A mandatory anti-money laundering training program for all management and staff carried out on a regular basis ?	YES

c) Adhering to all regulations and laws in your country regarding anti-money laundering and anti-terrorist financing ?	YES
d) Meeting all laws, regulations and guidelines established by regulatory authorities in all countries of operations ?	YES
e) An established process to periodically test the adequacy of AML procedures and policies ?	YES
KEY REGULATORY ISSUES	
a) Has your institution established and maintain, on an ongoing basis and anti-money laundering/anti-terrorist financing compliance programme ?	YES
b) Does your institution monitor and report suspicious transactions in accordance with applicable regulations ?	YES
c) Does your institution conduct business with shell banks ?	NO
d) Does your institution require that all accounts bear the name of the owner ?	YES
e) Do you send wire transfers or issue drafts on behalf of non-customers without obtaining proof of identification ?	NO
f) Does your institution monitor transactions and accounts in the name of suspected terrorist and/or terrorist organizations and report them to the competent authorities ?	YES
Does your institution monitor large cash deposits and withdrawals ?	YES
In relation to cross-border correspondent banking and other similar relationships, does your institution gather sufficient information about a correspondent institution to understand their business, reputation, quality of supervision and regulatory history ?	YES
With respect to these relationships, does your institution assess the respondent's anti-money laundering/anti-terrorist financing controls and are all new relationships approved by senior management ?	YES
Does your institution offer Payable Through (Clear-Through) Accounts ?	NO
Does your institution require complete information for ongoing wire transfer instructions, including sender and beneficiary names, addresses, account numbers, and purpose ?	YES
Has your institution been subjected to sanctions or punitive actions – related to anti-money laundering or anti-terrorist financing – by a regulator or law enforcement during the past five years ?	NO