

Rome, 23 November 2017

ATTESTATION ON ANTI-MONEY LAUNDERING AND TERRORIST FINANCING PROGRAM

Dear Sir/Madam,

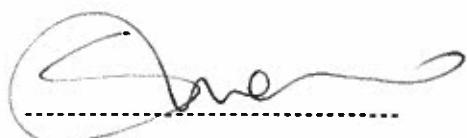
Iccrea Banca S.p.A. is an Italian financial institution engaged primarily in banking activities. It has its registered and head office at Via Lucrezia Romana 41/47, 00178 Roma, Italy and is subject to applicable laws and regulations in Italy.

Iccrea Banca S.p.A. is regulated by Bank of Italy, the Firm's lead regulator.

Iccrea Banca S.p.A. confirms that it has implemented throughout its Firm an Anti-Money Laundering Policy and Procedure framework designed to comply with all applicable anti-money laundering laws and regulations, including sanctions regulations. This AML policy framework provides for:

- The designation of an Anti-Money Laundering Officer of sufficient seniority who has responsibility for oversight of the Firm's compliance with relevant legislation, regulations, rules and industry guidance;
- A Risk-Based Approach towards assessing and managing the money laundering and terrorist financing risks for the Firm;
- A Risk-Based program for customer due diligence, identification, verification and know your customer
- (KYC) procedures, including:
 - Enhanced due diligence for those customers presenting higher risk profile; and
 - A prohibition against dealing with shell banks (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);
- Establishment of a risk-based systems and procedures to monitor customer accounts and activity;
- Internal procedures for reporting suspicious transactions or activity and the reporting of suspicious activity to the relevant law enforcement authorities;
- Procedures for screening of clients and transactions against applicable financial sanctions and embargo programs;
- A program of risk-based AML training to all employees; and
- Appropriate communications, internal controls, audit, monitoring and conformance arrangements to ensure that the Firm Policies and Principles are well understood and are being complied with in practice.

Yours faithfully,



Stefano Marino
Chief Compliance Officer

