

Rome, 23 November 2017

ICCREA BANCA S.p.A. is firmly committed to participating in international efforts to combat money laundering and the funding of terrorist and criminal activities.

Italy is member country of the Financial Action Task Force (FATF) and the European Union (EU) and has enacted laws and rules designed to implement the anti-money laundering policies of both FATF and the EU. The goal to these laws is to detect and prevent money laundering and potential terrorist financing.

INFORMATION ON INSTITUTION

- **Legal Name:** ICCREA Banca S.p.A. - Istituto Centrale del Credito Cooperativo
The company is part of the Iccrea Banking Group
- **Banking License:** no. 5251
- **SWIFT address:** ICRAITRR
- **Physical address:** Via Lucrezia Romana, 41- 47 - 00178 - Rome, Italy
- **Principal Place of Business:** as above
- **Location of head office:** as above
- **Principal business line:** ICCREA BANCA operates as the central institute of category of co-operative banks mainly providing their payment systems and financial markets access.

ICCREA Banca's mission is also to act as a connecting link between the Italian co-operative banks and the global markets, especially concerning domestic and international exchange and gross-net settlement procedures. Essentially, it provides banking services to:

- Banks and Financial Institutions qualified by domestic authority and with physical presence in Italy;
 - Other financial intermediaries authorized under European Union laws with who entertain direct accounts or act on behalf of co- operative credit banks;
 - Iccrea Banking Group employees.
- **Website:** <http://www.iccrea.it/> --- <http://www.gruppoiccrea.it>
 - **Contact Name:** AREA CCO

Via Lucrezia Romana, 41/47 00178 - Rome, Italy

+ 39 06 7207 1 e-mail: compliance@pec.iccreabanca.it

- **ABI (Italian Banking Association) : 08000**
 - **Domestic branches/agencies: Milan - Italy**
 - **Number of employees: 883 (on 12/31/2016)**
 - **Private owned by:**
 - **Italian Co-operative Banks directly or through original regional association (num. 324): 98,2%**
 - **Other Italian Banks or Entities (num. 8): 1,8%**
- ICCREA BANCA S.p.A. is a member of UNICO BANKING GROUP.**
- **Shares: not listened on any stock exchange**
 - **Corporate Bodies**

Board of Directors

Chairman	Magagni Giulio
Deputy Chairman	Maino Giuseppe
	Liberati Francesco
Directors	Alfieri Lucio
	Azzi Alessandro
	Carri Francesco
	Colombo Annibale
	Ferrarini Franco
	Feruglio Carlo Antonio
	Moretti Mara
	Porro Angelo
	Ricci Secondo
	Stra Pierpaolo
	Toson Leonardo
	Saporito Salvatore

Board of Auditors

Chairman	Gaspari Luigi
Auditors	Rondina Romualdo
	Sbarbati Fernando
Alternates	Andriolo Riccardo
	Fellegara Anna Maria

Legal Representative: Mr. Giulio Magagni - Chairman

Executive Power: Mr. Leonardo Rubattu - General Manager
Mr. Giovanni Boccuzzi - Vice General Manager

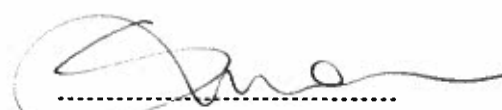
OTHER INFORMATION

- Laws and/or regulation in place covering anti-money laundering and anti-terrorist financing:
 - Reg. EU 2015/849 has been implemented by the Italian legislative Decree Law n. 90/2017, on the prevention of the use of the financial system for the purposes of money laundering or terrorist financing, amending Regulation (EU) No 648/2012 of the European Parliament and of the Council, and repealing Directive 2005/60/EC of the European Parliament and of the Council and Commission Directive 2006/70/EC;
- Reg. EU 2015/847 of the European Parliament and of the Council of 20 May 2015 on information accompanying transfers of funds and repealing Regulation (EC) No 1781/2006
- Primary regulatory bodies that supervise the Financial Institution:
 - Banca d'Italia - Via Nazionale, 91 00184 - Rome Italy;
 - Unità di Informazione Finanziaria (UIF), member of FATF, for suspicious activities and transactions - Banca d'Italia, Largo Bastia 35 00181 - Rome Italy;
 - CONSOB: Via Giovanni Battista Martini, 3 - 00198 Rome Italy;

POLICIES AND PROCEDURES

Please find attached the “Wolfsberg AML Questionnaire”, that provides an overview of our Financial Institution’s anti-money laundering policies and practices.

Date: 23 November 2017



Stefano Marino
CHIEF COMPLIANCE OFFICER

