



Anti-Money Laundering/ Know Your Customer Questionnaire
Company Profile



INTRODUCTION

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 a 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 of 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:** issued by Banca d'Italia in 1995
- **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 them the 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 (about n.450), 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:** www.iccreabanca.it
- **ABI (Italian Banking Association) code :** 08000
- **Number of employees:** 692 (March 2011)

▪ **Private owned by:**

- ICCREA HOLDING S.p.A. 99,998 %
 which is owned, more than 95%, by Co-operative Credit
 Banks directly or through original regional association
- Federazione Lombarda delle BCC s.c. 0,002%

ICCREA HOLDING S.p.A. is a member of **UNICO BANKING GROUP**.

- **Shares:** Iccrea Banca shares are not listed in any stock exchange market.

▪ **Corporate Bodies**

Board of Directors

Chairman	Carri Francesco
Deputy Chairman	Colombo Annibale
	Fiorelli Bruno
Directors	Bonacina Gianfranco
	Buda Pierino
	Capogrossi Maurizio
	Mazzotti Roberto
	Michielin Gianpiero
	Paldino Nicola
	Ravaglioli Domenico
	Saporito Salvatore

Board of Auditors

Chairman	Gaspari Luigi
Auditors	Catarozzo Camillo
	Nappini Eros
Alternates	De Rosi Antonio
	Mascarello Santiago

- **Legal Representative:** Mr. Francesco Carri - Chairman
- **Executive Power:** Mr. Leonardo Rubattu - General Manager
 Mr. Giovanni Gelsomino - Vice General Manager

OTHER INFORMATIONS

- **Laws and/or regulation in place covering anti-money laundering and anti-terrorist financing:**
the Third EU Directive has been implemented by the legislative decree of November 21st 2007, n.231 *“Accomplishment of the directive 2005/60/CE concerning the use of the financial system's prevention for the sake of laundering of income deriving from criminal activities and of terrorism funding as well as of the directive 2006/70/CE foreseeing the implementation measures”* and legislative decree of June 22nd 2007, n. 109 *“Measures for preventing, contrasting and repressing the terrorism funding and the activity of Countries threatening peace and international security, putting into effect the directive 2005/60/CE”*;
- **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, is the Financial Intelligence Unit 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: December 20th, 2011

Francesco Rescigno
Compliance Office Manager

