

To whom it may concern

Iccrea Banca	
Protocollo: ICR- OUT- 000001-2026 AML	Data: 09-01-2026
Argomento:	

Date: 09.01.2026

AML Comfort Letter

Dear Sir, Madam,

This letter serves to confirm that Iccrea Banca S.p.A. – Istituto Centrale del Credito Cooperativo (hereinafter "Iccrea Banca") and its subsidiaries and affiliated Banks within the Gruppo BCC Iccrea (the "Group") are fully committed to maintaining high standards of compliance with all applicable laws and regulations regarding the prevention of money laundering, terrorist financing, and financial crimes.

1. Regulatory Framework Iccrea Banca is an Italian licensed credit institution, regulated and supervised by the European Central Bank (ECB) and the Bank of Italy. As the Parent Company of the fourth-largest banking group in Italy, Iccrea Banca strictly adheres to the EU Anti-Money Laundering Directives (including the V and VI AML Directives) as transposed into Italian Law (Legislative Decree 231/2007, as amended).

2. AML/CTF Program The Group has implemented a comprehensive Internal Control System and an AML/CTF Global Policy which includes:

- **Customer Due Diligence (CDD):** Identification and verification of customers and their beneficial owners (UBO) through a risk-based approach.
- **Enhanced Due Diligence (EDD):** Applied to high-risk customers, including Politically Exposed Persons (PEPs) and those operating in high-risk jurisdictions.
- **Transaction Monitoring:** Automated and manual systems to detect suspicious patterns and unusual activities.
- **Reporting of Suspicious Transactions:** Mandatory reporting to the Italian Financial Intelligence Unit (Unità di Informazione Finanziaria - UIF).
- **Sanctions Screening:** Ongoing screening of customers and transactions against international sanction lists (UN, EU, OFAC, and local lists).

3. Governance and Organization Iccrea Banca has appointed a dedicated Anti-Money Laundering Officer (MLRO). The AML function is independent and reports directly to the Board of Directors. The Group's internal audit department performs periodic reviews to ensure the effectiveness of the AML framework.

4. Training and Awareness All employees and members of the Board of Directors undergo mandatory annual training on AML/CTF regulations, internal procedures, and the identification of financial crime risks.

5. Shell Banks and Correspondent Banking Iccrea Banca does not maintain any relationship with "Shell Banks" (banks with no physical presence or affiliation with a regulated financial group) and prohibits the use of its accounts by shell banks.

6. Wolfsberg Questionnaire For more detailed information, Iccrea Banca maintains an updated available at: [Wolfsberg Questionnaire \(CBDDQ\)](#).

Iccrea Banca S.p.A. remains at your disposal should you require further information regarding our compliance policies.

Sincerely,


Chief AML Officer
Giancarlo Parola