



Financial Institution Name:

SOCIETA' ITALIANA DI REVISIONE E FIDUCIARIA S.I.RE.F. S.P.A.

Location (Country) :

Italy

No #	Question	Answer
<b>1. ENTITY &amp; OWNERSHIP</b>		
1	Full Legal name	SOCIETA' ITALIANA DI REVISIONE E FIDUCIARIA S.I.RE.F. S.P.A (IN FORMA ABBREVIATA SIREF FIDUCIARIA S.P.A. O SIREFID S.P.A.)
2	Append a list of foreign branches which are covered by this questionnaire (if applicable)	N/A
3	Full Legal (Registered) Address	Via Melchiorre Gioia, 22 20124 Milan (Italy)
4	Full Primary Business Address (if different from above)	N/A
5	Date of Entity incorporation / establishment	9th November 1973
6	Select type of ownership and append an ownership chart if available	
6 a	Publicly Traded (25% of shares publicly traded)	No
6 a1	If Y, indicate the exchange traded on and ticker symbol	
6 b	Member Owned / Mutual	No
6 c	Government or State Owned by 25% or more	No
6 d	Privately Owned	Yes
6 d1	If Y, provide details of shareholders or ultimate beneficial owners with a holding of 10% or more	Fully owned by Fideuram - Intesa Sanpaolo Private Banking S.p.A. (100%)
7	% of the Entity's total shares composed of bearer shares	No bearer shares are issued
8	Does the Entity, or any of its branches, operate under an Offshore Banking License (OBL) ?	No
8 a	If Y, provide the name of the relevant branch/es which operate under an OBL	N/A

<b>2. AML, CTF &amp; SANCTIONS PROGRAMME</b>		
<b>9</b>	Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:	
<b>9 a</b>	Appointed Officer with sufficient experience / expertise	Yes
<b>9 b</b>	Cash Reporting	Not Applicable
<b>9 c</b>	CDD	Yes
<b>9 d</b>	EDD	Yes
<b>9 e</b>	Beneficial Ownership	Yes
<b>9 f</b>	Independent Testing	Yes
<b>9 g</b>	Periodic Review	Yes
<b>9 h</b>	Policies and Procedures	Yes
<b>9 i</b>	Risk Assessment	Yes
<b>9 j</b>	Sanctions	Yes
<b>9 k</b>	PEP Screening	Yes
<b>9 l</b>	Adverse Information Screening	Yes
<b>9 m</b>	Suspicious Activity Reporting	Yes
<b>9 n</b>	Training and Education	Yes
<b>9 o</b>	Transaction Monitoring	Yes
<b>10</b>	Is the Entity's AML, CTF & Sanctions policy approved at least annually by the Board or equivalent Senior Management Committee?	Half-Annually/Every six months
<b>11</b>	Does the Entity use third parties to carry out any components of its AML, CTF & Sanctions programme?	No
<b>11a</b>	If Y, provide further details	
<b>3. ANTI BRIBERY &amp; CORRUPTION</b>		
<b>12</b>	Has the Entity documented policies and procedures consistent with applicable ABC regulations and requirements to [reasonably] prevent, detect and report bribery and corruption?	Yes
<b>13</b>	Does the Entity's internal audit function or other independent third party cover ABC Policies and Procedures?	Yes
<b>14</b>	Does the Entity provide mandatory ABC training to:	
<b>14 a</b>	Board and Senior Committee Management	Yes
<b>14 b</b>	1st Line of Defence	Yes
<b>14 c</b>	2nd Line of Defence	Yes
<b>14 d</b>	3rd Line of Defence	Yes
<b>14 e</b>	3rd parties to which specific compliance activities subject to ABC risk have been outsourced	Not Applicable
<b>14 f</b>	Non-employed workers as appropriate (contractors / consultants)	Not Applicable

<b>4. AML, CTF &amp; SANCTIONS POLICIES &amp; PROCEDURES</b>		
<b>15</b>	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report:	
<b>15 a</b>	Money laundering	Yes
<b>15 b</b>	Terrorist financing	Yes
<b>15 c</b>	Sanctions violations	Yes
<b>16</b>	Does the Entity have policies and procedures that:	
<b>16 a</b>	Prohibit the opening and keeping of anonymous and fictitious named accounts	Yes
<b>16 b</b>	Prohibit the opening and keeping of accounts for unlicensed banks and / or NBFIs	Yes
<b>16 c</b>	Prohibit dealing with other entities that provide banking services to unlicensed banks	Yes
<b>16 d</b>	Prohibit accounts / relationships with shell banks	Yes
<b>16 e</b>	Prohibit dealing with another Entity that provides services to shell banks	Yes
<b>16 f</b>	Prohibit opening and keeping of accounts for Section 311 designated entities	Yes
<b>16 g</b>	Prohibit opening and keeping of accounts for any of unlicensed / unregulated remittance agents, exchanges houses, casa de cambio, bureaux de change or money transfer agents	Yes
<b>16 h</b>	Assess the risks of relationships with domestic and foreign PEPs, including their family and close associates	Yes
<b>16 i</b>	Define escalation processes for financial crime risk issues	Yes
<b>16 j</b>	Specify how potentially suspicious activity identified by employees is to be escalated and investigated	Yes
<b>16 k</b>	Outline the processes regarding screening for sanctions, PEPs and negative media	Yes
<b>17</b>	Has the Entity defined a risk tolerance statement or similar document which defines a risk boundary around their business?	Yes
<b>18</b>	Does the Entity have a record retention procedures that comply with applicable laws?	Yes
<b>18 a</b>	If Y, what is the retention period?	5 years or more

5. KYC, CDD and EDD		
19	Does the Entity verify the identity of the customer?	Yes
20	Do the Entity's policies and procedures set out when CDD must be completed, e.g. at the time of onboarding or within 30 days	Yes
21	Which of the following does the Entity gather and retain when conducting CDD? Select all that apply:	
21 a	Ownership structure	Yes
21 b	Customer identification	Yes
21 c	Expected activity	Yes
21 d	Nature of business / employment	Yes
21 e	Product usage	Yes
21 f	Purpose and nature of relationship	Yes
21 g	Source of funds	Yes
21 h	Source of wealth	Yes
22	Are each of the following identified:	
22 a	Ultimate beneficial ownership	Yes
22 a1	Are ultimate beneficial owners verified?	Yes
22 b	Authorised signatories (where applicable)	Yes
22 c	Key controllers	Yes
22 d	Other relevant parties	KYC on Trust includes identification and verification of all parties connected to the legal arrangement (such as trustee, settlor, guardian, beneficiary(ies) and additional ultimate controllers)
23	Does the due diligence process result in customers receiving a risk classification?	Yes
24	Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?	Yes
25	Does the Entity have policies, procedures and processes to review and escalate potential matches from screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?	Yes
26	Does the Entity have a process to review and update customer information based on:	
26 a	KYC renewal	Yes
26 b	Trigger event	Yes
27	From the list below, which categories of customers or industries are subject to EDD and / or are restricted, or prohibited by the Entity's FCC programme?	
27 a	Non-account customers	Prohibited
27 b	Non-resident customers	EDD & restricted on a risk based approach
27 c	Shell banks	Prohibited
27 d	MVTS/ MSB customers	Do not have this category of customer or industry
27 e	PEPs	EDD on a risk based approach
27 f	PEP Related	EDD on a risk based approach
27 g	PEP Close Associate	EDD on a risk based approach
27 h	Correspondent Banks	Do not have this category of customer or industry
27 h1	If EDD or EDD & restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2014?	Yes
27 i	Arms, defense, military	EDD & restricted on a risk based approach
27 j	Atomic power	Do not have this category of customer or industry
27 k	Extractive industries	EDD on a risk based approach

Wolfsberg Group Financial Crime Compliance Questionnaire (FCCQ) v1.1

27 l	Precious metals and stones	EDD on a risk based approach
27 m	Unregulated charities	EDD on a risk based approach
27 n	Regulated charities	EDD on a risk based approach
27 o	Red light business / Adult entertainment	EDD on a risk based approach
27 p	Non-Government Organisations	EDD on a risk based approach
27 q	Virtual currencies	EDD on a risk based approach
27 r	Marijuana	EDD & restricted on a risk based approach
27 s	Embassies / Consulates	EDD on a risk based approach
27 t	Gambling	EDD on a risk based approach
27 u	Payment Service Provider	Do not have this category of customer or industry
27 v	Other (specify)	Coal mining and coal power: EDD & restricted on a risk based approach; 27i: SIREF deals with customers only if licenced by Italian/EU gov; 27r: allowed for medical purposes in compliance with the Italian legislation.
28	If restricted, provide details of the restriction	27b: Specific restrictions on relationships and transactions with certain legal entities based in countries with a high risk of money laundering and terrorist financing are established according to the internal policies.

<b>6. MONITORING &amp; REPORTING</b>		
<b>29</b>	Does the Entity have risk based policies, procedures and monitoring processes for the identification and reporting of suspicious activity?	Yes
<b>30</b>	What is the method used by the Entity to monitor transactions for suspicious activities?	Automated
<b>31</b>	Does the Entity have regulatory requirements to report suspicious transactions?	Yes
<b>31 a</b>	If Y, does the Entity have policies, procedures and processes to comply with suspicious transactions reporting requirements?	Yes
<b>32</b>	Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity?	Yes
<b>7. PAYMENT TRANSPARENCY</b>		
<b>33</b>	Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards?	No
<b>34</b>	Does the Entity have policies, procedures and processes to [reasonably] comply with and have controls in place to ensure compliance with:	
<b>34 a</b>	FATF Recommendation 16	No
<b>34 b</b>	Local Regulations	No
<b>34 b1</b>	Specify the regulation	
<b>34 c</b>	If N, explain	The company doesn't make payments, that are conveyed through bank accounts.

<b>8. SANCTIONS</b>		
<b>35</b>	Does the Entity have policies, procedures or other controls reasonably designed to prohibit and / or detect actions taken to evade applicable sanctions prohibitions, such as stripping, or the resubmission and / or masking, of sanctions relevant information in cross border transactions?	Yes
<b>36</b>	Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists?	Yes
<b>37</b>	Select the Sanctions Lists used by the Entity in its sanctions screening processes:	
<b>37 a</b>	Consolidated United Nations Security Council Sanctions List (UN)	Used for screening customers and beneficial owners (i.e. reference data)
<b>37 b</b>	United States Department of the Treasury's Office of Foreign Assets Control (OFAC)	Used for screening customers and beneficial owners (i.e. reference data)
<b>37 c</b>	Office of Financial Sanctions Implementation HMT (OFSI)	Used for screening customers and beneficial owners (i.e. reference data)
<b>37 d</b>	European Union Consolidated List (EU)	Used for screening customers and beneficial owners (i.e. reference data)
<b>37 e</b>	Lists maintained by other G7 member countries	Not used
<b>37 f</b>	Other (specify)	Internal Lists (including those issued by Italian regulatory Authority) and selected World Check lists.
<b>38</b>	Does the Entity have a physical presence, e.g., branches, subsidiaries, or representative offices located in countries / regions against which UN, OFAC, OFSI, EU and G7 member countries have enacted comprehensive jurisdiction-based Sanctions?	No
<b>9. TRAINING &amp; EDUCATION</b>		
<b>39</b>	Does the Entity provide mandatory training, which includes :	
<b>39 a</b>	Identification and reporting of transactions to government authorities	Yes
<b>39 b</b>	Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered	Yes
<b>39 c</b>	Internal policies for controlling money laundering, terrorist financing and sanctions violations	Yes
<b>39 d</b>	New issues that occur in the market, e.g., significant regulatory actions or new regulations	Yes
<b>40</b>	Is the above mandatory training provided to :	
<b>40 a</b>	Board and Senior Committee Management	Yes
<b>40 b</b>	1st Line of Defence	Yes
<b>40 c</b>	2nd Line of Defence	Yes
<b>40 d</b>	3rd Line of Defence	Yes
<b>40 e</b>	3rd parties to which specific FCC activities have been outsourced	Not Applicable
<b>40 f</b>	Non-employed workers (contractors / consultants)	Not Applicable

**10. AUDIT**


41	In addition to inspections by the government supervisors / regulators, does the Entity have an internal audit function, a testing function or other independent third party, or both, that assesses FCC AML, CTF and Sanctions policies and practices on a regular basis?	Yes
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**Signature Page**

Wolfsberg Group Financial Crime Compliance Questionnaire 2020 (FCCQ V1.1)

SOCIETA' ITALIANA DI REVISIONE E FIDUCIARIA S.I.R.E.F. S.p.A. \_\_\_\_\_ (Financial Institution name)

ERMANN0 BELLOTTI, AML Officer  
 I, \_\_\_\_\_ (Senior Compliance Manager- Second Line representative), certify that I have read and understood this declaration, that the answers provided in this Wolfsberg FCCQ are complete and correct to my honest belief.

 03/07/2023 \_\_\_\_\_ (Signature & Date)