



Financial Institution Name: SIFIN S.R.L.
 Location (Country): IMOLA (BO), ITALY

The questionnaire is required to be answered on a Legal Entity (LE) Level. The Financial Institution should answer the questionnaire at the legal entity level including any branches for which the client base, products and control model are materially similar to the LE Head Office. This questionnaire should not cover more than one LE. Each question in the CBDDQ will need to be addressed from the perspective of the LE and on behalf of all of its branches. If a response for the LE differs for one of its branches, this needs to be highlighted and details regarding this difference captured at the end of each sub-section. If a branch's business activity (products offered, client base etc.) is materially different than its Entity Head Office, a separate questionnaire can be completed for that branch.

No #	Question	Answer
1. ENTITY & OWNERSHIP		
1	Full Legal Name	SIFIN S.R.L.
2	Append a list of foreign branches which are covered by this questionnaire	SIFIN S.R.L. DOES NOT HOLD FOREIGN BRANCHES
3	Full Legal (Registered) Address	VIA EMILIA 196 - 40026 IMOLA (BO) - ITALY
4	Full Primary Business Address (if different from above)	
5	Date of Entity incorporation/establishment	19/06/1985
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	No ☒
6 d1	If Y, provide details of shareholders or ultimate beneficial owners with a holding of 10% or more	LA CASSA DI RAVENNA SPA 90,50%
7	% of the Entity's total shares composed of bearer shares	0%
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	
9	Does the Bank have a Virtual Bank License or provide services only through online channels?	No ☒
10	Name of primary financial regulator/supervisory authority	BANCA D'ITALIA
11	Provide Legal Entity Identifier (LEI) if available	
12	Provide the full legal name of the ultimate parent (if different from the Entity completing the DDQ)	

13	Jurisdiction of licensing authority and regulator of ultimate parent	
14	Select the business areas applicable to the Entity	
14 a	Retail Banking	No ☐
14 b	Private Banking	No ☐
14 c	Commercial Banking	No ☐
14 d	Transactional Banking	No ☐
14 e	Investment Banking	No ☐
14 f	Financial Markets Trading	No ☐
14 g	Securities Services/Custody	No ☐
14 h	Broker/Dealer	No ☐
14 i	Multilateral Development Bank	No ☐
14 j	Wealth Management	No ☐
14 k	Other (please explain)	FINANCIAL INTERMEDIARY
15	Does the Entity have a significant (10% or more) portfolio of non-resident customers or does it derive more than 10% of its revenue from non-resident customers? (Non-resident means customers primarily resident in a different jurisdiction to the location where bank services are provided)	No ☐
15 a	If Y, provide the top five countries where the non-resident customers are located.	
16	Select the closest value:	
16 a	Number of employees	1-50 ☐
16 b	Total Assets	Between \$100 and \$500 million ☐
17	Confirm that all responses provided in the above Section are representative of all the LE's branches.	Yes ☐
17 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
18	If appropriate, provide any additional information/context to the answers in this section.	
2. PRODUCTS & SERVICES		
19	Does the Entity offer the following products and services:	
19 a	Correspondent Banking	No ☐
19 a1	If Y	
19 a1a	Does the Entity offer Correspondent Banking services to domestic banks?	Please select
19 a1b	Does the Entity allow domestic bank clients to provide downstream relationships?	Please select
19 a1c	Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks?	Please select
19 a1d	Does the Entity offer Correspondent Banking services to foreign banks?	Please select
19 a1e	Does the Entity allow downstream relationships with foreign banks?	Please select
19 a1f	Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks?	Please select
19 a1g	Does the Entity offer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTSS)?	Please select
19 a1h	Does the Entity allow downstream relationships with MSBs, MVTSSs, or Payment Service Provider (PSPs)?	
19 a1h1	MSBs	Please select
19 a1h2	MVTSSs	Please select
19 a1h3	PSPs	Please select

19 a1i	Does the Entity have processes and procedures in place to identify downstream relationships with MSBs /MTSs/PSPs?	Please select	
19 b	Cross-Border Bulk Cash Delivery	No	Answer
19 c	Cross-Border Remittances	No	Answer
19 d	Domestic Bulk Cash Delivery	No	Answer
19 e	Hold Mail	No	Answer
19 f	International Cash Letter	No	Answer
19 g	Low Price Securities	No	Answer
19 h	Payable Through Accounts	No	Answer
19 i	Payment services to non-bank entities who may then offer third party payment services to their customers?	Please select	
19 i1	If Y, please select all that apply below?		
19 i2	Third Party Payment Service Providers	Please select	
19 i3	Virtual Asset Service Providers (VASPs)	Please select	
19 i4	eCommerce Platforms	Please select	
19 i5	Other - Please explain		
19 j	Private Banking	No	Answer
19 k	Remote Deposit Capture (RDC)	No	Answer
19 l	Sponsoring Private ATMs	No	Answer
19 m	Stored Value Instruments	No	Answer
19 n	Trade Finance	No	Answer
19 o	Virtual Assets	No	Answer
19 p	For each of the following please state whether you offer the service to walk-in customers and if so, the applicable level of due diligence:		
19 p1	Check cashing service	No	Answer
19 p1a	If yes, state the applicable level of due diligence	Please select	
19 p2	Wire transfers	No	Answer
19 p2a	If yes, state the applicable level of due diligence	Please select	
19 p3	Foreign currency conversion	No	Answer
19 p3a	If yes, state the applicable level of due diligence	Please select	
19 p4	Sale of Monetary Instruments	No	Answer
19 p4a	If yes, state the applicable level of due diligence	Please select	
19 p5	If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence.		
19 q	Other high-risk products and services identified by the Entity (please specify)		
20	Confirm that all responses provided in the above Section are representative of all the LE's branches.	No branches	
20 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.		
21	If appropriate, provide any additional information/context to the answers in this section.		
3. AML, CTF & SANCTIONS PROGRAMME			
22	Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:		
22 a	Appointed Officer with sufficient experience/expertise	Yes	Answer
22 b	Adverse Information Screening	Yes	Answer
22 c	Beneficial Ownership	Yes	Answer
22 d	Cash Reporting	Yes	Answer
22 e	CDD	Yes	Answer
22 f	EDD	Yes	Answer
22 g	Independent Testing	Yes	Answer
22 h	Periodic Review	Yes	Answer
22 i	Policies and Procedures	Yes	Answer
22 j	PEP Screening	Yes	Answer
22 k	Risk Assessment	Yes	Answer
22 l	Sanctions	Yes	Answer

22 m	Suspicious Activity Reporting	Yes	☐
22 n	Training and Education	Yes	☐
22 o	Transaction Monitoring	Yes	☐
23	How many full time employees are in the Entity's AML, CTF & Sanctions Compliance Department?	1-10	☐
24	Is the Entity's AML, CTF & Sanctions policy approved at least annually by the Board or equivalent Senior Management Committee? If N, describe your practice in Question 29.	Yes	☐
25	Does the Board receive, assess, and challenge regular reporting on the status of the AML, CTF, & Sanctions programme?	Yes	☐
26	Does the Entity use third parties to carry out any components of its AML, CTF & Sanctions programme?	Yes	☐
26 a	If Y, provide further details	SIFIN S.R.L. HAS DECIDED TO OUTSOURCE THE ANTI MONEY LOUNDERING FUNCTION TO THE PARENT COMPANY	
27	Does the entity have a whistleblower policy?	Yes	☐
28	Confirm that all responses provided in the above Section are representative of all the LE's branches	No branches	
28 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.		
29	If appropriate, provide any additional information/context to the answers in this section.		
4. ANTI BRIBERY & CORRUPTION			
30	Has the Entity documented policies and procedures consistent with applicable ABC regulations and requirements to reasonably prevent, detect and report bribery and corruption?	Yes	☐
31	Does the Entity have an enterprise wide programme that sets minimum ABC standards?	Yes	☐
32	Has the Entity appointed a designated officer or officers with sufficient experience/expertise responsible for coordinating the ABC programme?	Yes	☐
33	Does the Entity have adequate staff with appropriate levels of experience/expertise to implement the ABC programme?	Yes	☐
34	Is the Entity's ABC programme applicable to:	Not Applicable	
35	Does the Entity have a global ABC policy that:		
35 a	Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage.	Yes	☐
35 b	Includes enhanced requirements regarding interaction with public officials?	Yes	☐
35 c	Includes a prohibition against the falsification of books and records (this may be within the ABC policy or any other policy applicable to the Legal Entity)?	Yes	☐
36	Does the Entity have controls in place to monitor the effectiveness of their ABC programme?	Yes	☐
37	Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme?	Yes	☐
38	Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months?	Yes	☐
38 a	If N, provide the date when the last ABC EWRA was completed.		
39	Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment?	Yes	☐
40	Does the Entity's ABC EWRA cover the inherent risk components detailed below:	Please select	☐
40 a	Potential liability created by intermediaries and other third-party providers as appropriate	Yes	☐

40 b	Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries	Yes	☐
40 c	Transactions, products or services, including those that involve state-owned or state-controlled entities or public officials	Yes	☐
40 d	Corruption risks associated with gifts and hospitality, hiring/internships, charitable donations and political contributions	Yes	☐
40 e	Changes in business activities that may materially increase the Entity's corruption risk	Yes	☐
41	Does the Entity's internal audit function or other independent third party cover ABC Policies and Procedures?	Yes	☐
42	Does the Entity provide mandatory ABC training to:		
42 a	Board and senior Committee Management	Yes	☐
42 b	1st Line of Defence	Yes	☐
42 c	2nd Line of Defence	Yes	☐
42 d	3rd Line of Defence	Yes	☐
42 e	Third parties to which specific compliance activities subject to ABC risk have been outsourced	Not Applicable	☐
42 f	Non-employed workers as appropriate (contractors/consultants)	Yes	☐
43	Does the Entity provide ABC training that is targeted to specific roles, responsibilities and activities?	Yes	☐
44	Confirm that all responses provided in the above Section are representative of all the LE's branches	No branches	
44 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.		
45	If appropriate, provide any additional information/context to the answers in this section.		
5. AML, CTF & SANCTIONS POLICIES & PROCEDURES			
46	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report:		
46 a	Money laundering	Yes	☐
46 b	Terrorist financing	Yes	☐
46 c	Sanctions violations	Yes	☐
47	Are the Entity's policies and procedures updated at least annually?	Yes	☐
48	Has the Entity chosen to compare its policies and procedures against:		
48 a	U.S. Standards	Yes	☐
48 a1	If Y, does the Entity retain a record of the results?	Yes	☐
48 b	EU Standards	Yes	☐
48 b1	If Y, does the Entity retain a record of the results?	Yes	☐
49	Does the Entity have policies and procedures that:		
49 a	Prohibit the opening and keeping of anonymous and fictitious named accounts	Yes	☐
49 b	Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs	Yes	☐
49 c	Prohibit dealing with other entities that provide banking services to unlicensed banks	Yes	☐
49 d	Prohibit accounts/relationships with shell banks	Yes	☐
49 e	Prohibit dealing with another entity that provides services to shell banks	Yes	☐
49 f	Prohibit opening and keeping of accounts for Section 311 designated entities	Yes	☐
49 g	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	☐
49 h	Assess the risks of relationships with domestic and foreign PEPs, including their family and close associates	Yes	☐

49 i	Define the process for escalating financial crime risk issues/potentially suspicious activity identified by employees	Yes	☐
49 j	Define the process, where appropriate, for terminating existing customer relationships due to financial crime risk	Yes	☐
49 k	Define the process for exiting clients for financial crime reasons that applies across the entity, including foreign branches and affiliates	Yes	☐
49 l	Define the process and controls to identify and handle customers that were previously exited for financial crime reasons if they seek to re-establish a relationship	Yes	☐
49 m	Outline the processes regarding screening for sanctions, PEPs and Adverse Media/Negative News	Yes	☐
49 n	Outline the processes for the maintenance of internal "watchlists"	Yes	☐
50	Has the Entity defined a risk tolerance statement or similar document which defines a risk boundary around their business?	Yes	☐
51	Does the Entity have record retention procedures that comply with applicable laws?	Yes	☐
51 a	If Y, what is the retention period?	5 years or more	☐
52	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes	☐
52 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.		
53	If appropriate, provide any additional information/context to the answers in this section.		
6. AML, CTF & SANCTIONS RISK ASSESSMENT			
54	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:		
54 a	Client	Yes	☐
54 b	Product	Yes	☐
54 c	Channel	Yes	☐
54 d	Geography	Yes	☐
55	Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below:		
55 a	Transaction Monitoring	Yes	☐
55 b	Customer Due Diligence	Yes	☐
55 c	PEP Identification	Yes	☐
55 d	Transaction Screening	Yes	☐
55 e	Name Screening against Adverse Media/Negative News	Yes	☐
55 f	Training and Education	Yes	☐
55 g	Governance	Yes	☐
55 h	Management Information	Yes	☐
56	Has the Entity's AML & CTF EWRA been completed in the last 12 months?	Yes	☐
56 a	If N, provide the date when the last AML & CTF EWRA was completed.		
57	Does the Entity's Sanctions EWRA cover the inherent risk components detailed below:		
57 a	Client	Yes	☐
57 b	Product	Yes	☐
57 c	Channel	Yes	☐
57 d	Geography	Yes	☐
58	Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below:		
58 a	Customer Due Diligence	Yes	☐
58 b	Governance	Yes	☐
58 c	List Management	No	☐
58 d	Management Information	Yes	☐

58 e	Name Screening	Yes	☐
58 f	Transaction Screening	Yes	☐
58 g	Training and Education	Yes	☐
59	Has the Entity's Sanctions EWRA been completed in the last 12 months?	Yes	☐
59 a	If N, provide the date when the last Sanctions EWRA was completed.		
60	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes	☐
60 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.		
61	If appropriate, provide any additional information/context to the answers in this section.		
7. KYC, CDD and EDD			
62	Does the Entity verify the identity of the customer?	Yes	☐
63	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	☐
64	Which of the following does the Entity gather and retain when conducting CDD? Select all that apply:		
64 a	Customer identification	Yes	☐
64 b	Expected activity	Yes	☐
64 c	Nature of business/employment	Yes	☐
64 d	Ownership structure	Yes	☐
64 e	Product usage	Yes	☐
64 f	Purpose and nature of relationship	Yes	☐
64 g	Source of funds	Yes	☐
64 h	Source of wealth	Yes	☐
65	Are each of the following identified:		
65 a	Ultimate beneficial ownership	Yes	☐
65 a1	Are ultimate beneficial owners verified?	Yes	☐
65 b	Authorised signatories (where applicable)	Yes	☐
65 c	Key controllers	Yes	☐
65 d	Other relevant parties	Yes	☐
66	What is the Entity's minimum (lowest) threshold applied to beneficial ownership identification?	25%	☐
67	Does the due diligence process result in customers receiving a risk classification?	No	☐
67 a	If Y, what factors/criteria are used to determine the customer's risk classification? Select all that apply:		
67 a1	Product Usage	Yes	☐
67 a2	Geography	Yes	☐
67 a3	Business Type/Industry	Yes	☐
67 a4	Legal Entity type	Yes	☐
67 a5	Adverse Information	Yes	☐
67 a6	Other (specify)		
68	For high risk non-individual customers, is a site visit a part of your KYC process?	Yes	☐
68 a	If Y, is this at:		
68 a1	Onboarding	Yes	☐
68 a2	KYC renewal	Yes	☐
68 a3	Trigger event	Yes	☐
68 a4	Other	Please select	☐
68 a4a	If yes, please specify "Other"		
69	Does the Entity have a risk based approach to screening customers for Adverse Media/Negative News?	Yes	☐
69 a	If Y, is this at:		
69 a1	Onboarding	Yes	☐
69 a2	KYC renewal	Yes	☐

69 a3	Trigger event	Yes	
70	What is the method used by the Entity to screen for Adverse Media/Negative News?	Combination of automated and manual	
71	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	
71 a	If Y, is this at:		
71 a1	Onboarding	Yes	
71 a2	KYC renewal	Yes	
71 a3	Trigger event	Yes	
72	What is the method used by the Entity to screen PEPs?	Combination of automated and manual	
73	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	
74	Is KYC renewed at defined frequencies based on risk rating (Periodic Reviews)?	Yes	
74 a	If yes, select all that apply:		
74 a1	Less than one year	No	
74 a2	1 – 2 years	Yes	
74 a3	3 – 4 years	Yes	
74 a4	5 years or more	Yes	
74 a5	Trigger-based or perpetual monitoring reviews	Yes	
74 a6	Other (Please specify)		
75	Does the Entity maintain and report metrics on current and past periodic or trigger event due diligence reviews?	Yes	
76	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?		
76 a	Arms, defence, military	Always subject to EDD	
76 b	Respondent Banks	Do not have this category of customer or industry	
76 b1	If EDD or restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022?	Please select	
76 c	Embassies/Consulates	Always subject to EDD	
76 d	Extractive industries	Do not have this category of customer or industry	
76 e	Gambling customers	Prohibited	
76 f	General Trading Companies	EDD on risk-based approach	
76 g	Marijuana-related Entities	Prohibited	
76 h	MSB/MVTs customers	Do not have this category of customer or industry	
76 i	Non-account customers	Please select	
76 j	Non-Government Organisations	Prohibited	
76 k	Non-resident customers	EDD on risk-based approach	
76 l	Nuclear power	Prohibited	
76 m	Payment Service Providers	Do not have this category of customer or industry	
76 n	PEPs	Always subject to EDD	
76 o	PEP Close Associates	Always subject to EDD	
76 p	PEP Related	Always subject to EDD	
76 q	Precious metals and stones	EDD on risk-based approach	
76 r	Red light businesses/Adult entertainment	Prohibited	
76 s	Regulated charities	EDD on risk-based approach	
76 t	Shell banks	Prohibited	
76 u	Travel and Tour Companies	No EDD/restriction or prohibition	
76 v	Unregulated charities	Do not have this category of customer or industry	
76 w	Used Car Dealers	Do not have this category of customer or industry	
76 x	Virtual Asset Service Providers	Prohibited	
76 y	Other (specify)		
77	If restricted, provide details of the restriction		
78	Does EDD require senior business management and/or compliance approval?	Yes	

78 a	If Y indicate who provides the approval:	Both	☐
79	Does the Entity have specific procedures for onboarding entities that handle client money such as lawyers, accountants, consultants, real estate agents?	No	☐
80	Does the Entity perform an additional control or quality review on clients subject to EDD?	Yes	☐
81	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes	☐
81 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to		
82	If appropriate, provide any additional information/context to the answers in this section.		
8. MONITORING & REPORTING			
83	Does the Entity have risk based policies, procedures and monitoring processes for the identification and reporting of suspicious activity?	Yes	☐
84	What is the method used by the Entity to monitor transactions for suspicious activities?	Combination of automated and manual	☐
84 a	If manual or combination selected, specify what type of transactions are monitored manually	PERIODIC REPORTS ON ACCOUNTS AND CUSTOMERS IN COMPLIANCE WITH INDICATORS OF ANOMALY ISSUED BY THE SUPERVISORY AUTHORITY	
84 b	If automated or combination selected, are internal system or vendor-sourced tools used?	Vendor-sourced tools	☐
84 b1	If 'Vendor-sourced tool' or 'Both' selected, what is the name of the vendor/tool?	WEB EVALUATION BY NETECH	
84 b2	When was the tool last updated?	< 1 year	☐
84 b3	When was the automated Transaction Monitoring application last calibrated?	< 1 year	☐
85	Does the Entity have regulatory requirements to report suspicious transactions?	Yes	☐
85 a	If Y, does the Entity have policies, procedures and processes to comply with suspicious transaction reporting requirements?	Yes	☐
86	Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity?	Yes	☐
87	Does the Entity have a data quality management programme to ensure that complete data for all transactions are subject to monitoring?	Yes	☐
88	Does the Entity have processes in place to respond to Request For Information (RFIs) from other entities in a timely manner?	Yes	☐
89	Does the Entity have processes in place to send Requests for Information (RFIs) to their customers in a timely manner?	Yes	☐
90	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes	☐
90 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to		
91	If appropriate, provide any additional information/context to the answers in this section.		
9. PAYMENT TRANSPARENCY			
92	Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards?	No	☐

93	Does the Entity have policies, procedures and processes to comply with and have controls in place to ensure compliance with:	
93 a	FATF Recommendation 16	Yes ☐
93 b	Local Regulations	Yes ☒
93 b1	If Y, specify the regulation	REGULATION EU 2015/847 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL OF 20TH MAY 2015 ON INFORMATION ACCOMPANYING TRANSFER OF FUNDS AND REPEATING REGULATION (EC) NUMBER 1781/2006, LEGISLATIVE DECREE 90/2017
93 c	If N, explain	
94	Does the Entity have controls to support the inclusion of required and accurate originator information in cross border payment messages?	Yes ☐
95	Does the Entity have controls to support the inclusion of required beneficiary information cross-border payment messages?	Yes ☐
95 a	If Y, does the Entity have procedures to include beneficiary address including country in cross border payments?	Yes ☐
96	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes ☐
96 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
97	If appropriate, provide any additional information/context to the answers in this section.	
10. SANCTIONS		
98	Does the Entity have a Sanctions Policy approved by management regarding compliance with sanctions law applicable to the Entity, including with respect to its business conducted with, or through accounts held at foreign financial institutions?	Yes ☐
99	Does the Entity have policies, procedures, or other controls reasonably designed to prevent the use of another entity's accounts or services in a manner causing the other entity to violate sanctions prohibitions applicable to the other entity (including prohibitions within the other entity's local jurisdiction)?	Yes ☐
100	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 ☐
101	Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists?	Yes ☐
102	What is the method used by the Entity for sanctions screening?	Automated ☐
102 a	If 'automated' or 'both automated and manual' selected:	
102 a1	Are internal system of vendor-sourced tools used?	Vendor-sourced tools ☐
102 a1a	If a 'vendor-sourced tool' or 'both' selected, what is the name of the vendor/tool?	GPR SISTEMI BANCARI
102 a2	When did you last test the effectiveness (of finding true matches) and completeness (lack of missing data) of the matching configuration of the automated tool? (If 'Other' please explain in Question 110)	< 1 year ☐
103	Does the Entity screen all sanctions relevant data, including at a minimum, entity and location information, contained in cross border transactions against Sanctions Lists?	Yes ☐
104	What is the method used by the Entity?	Combination of automated and manual ☐

105	Does the Entity have a data quality management programme to ensure that complete data for all transactions are subject to sanctions screening?	Yes	v
106	Select the Sanctions Lists used by the Entity in its sanctions screening processes:		
106 a	Consolidated United Nations Security Council Sanctions List (UN)	Used for screening customers and beneficial owners (i.e. reference data)	v
106 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)	v
106 c	Office of Financial Sanctions Implementation HMT (OFSI)	Used for screening customers and beneficial owners (i.e. reference data)	v
106 d	European Union Consolidated List (EU)	Used for screening customers and beneficial owners (i.e. reference data)	v
106 e	Lists maintained by other G7 member countries	Used for screening customers and beneficial owners (i.e. reference data)	v
106 f	Other (specify)		
107	When regulatory authorities make updates to their Sanctions list, how many business days before the entity updates their active manual and/or automated screening systems against:		
107 a	Customer Data	Same day to 2 business days	v
107 b	Transactions	Same day to 2 business days	v
108	Does the Entity have a physical presence, e.g. branches, subsidiaries, or representative offices located in countries/regions against which UN, OFAC, OFSI, EU or G7 member countries have enacted comprehensive jurisdiction-based Sanctions?	Please select	
109	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes	v
109 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.		
110	If appropriate, provide any additional information/context to the answers in this section.		
11. TRAINING & EDUCATION			
111	Does the Entity provide mandatory training, which includes:		
111 a	Identification and reporting of transactions to government authorities	Yes	v
111 b	Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered	Yes	v
111 c	Internal policies for controlling money laundering, terrorist financing and sanctions violations	Yes	v
111 d	New issues that occur in the market, e.g. significant regulatory actions or new regulations	Yes	v
111 e	Conduct and Culture	Yes	v
111 f	Fraud	Yes	v
112	Is the above mandatory training provided to:		
112 a	Board and Senior Committee Management	Yes	v
112 b	1st Line of Defence	Yes	v
112 c	2nd Line of Defence	Yes	v
112 d	3rd Line of Defence	Yes	v
112 e	Third parties to which specific FCC activities have been outsourced	Not Applicable	v
112 f	Non-employed workers (contractors/consultants)	Yes	v
113	Does the Entity provide AML, CTF & Sanctions training that is targeted to specific roles, responsibilities and high-risk products, services and activities?	Yes	v
114	Does the Entity provide customised training for AML, CTF and Sanctions staff?	Yes	v
114 a	If Y, how frequently is training delivered?	Annually	v
115	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes	v

115 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
116	If appropriate, provide any additional information/context to the answers in this section.	
12. QUALITY ASSURANCE/COMPLIANCE TESTING		
117	Does the Entity have a program wide risk based Quality Assurance programme for financial crime (separate from the independent Audit function)?	Yes ☐
118	Does the Entity have a program wide risk based Compliance Testing process (separate from the independent Audit function)?	Yes ☐
119	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes ☐
119 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
120	If appropriate, provide any additional information/context to the answers in this section.	
13. AUDIT		
121	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, ABC, Fraud and Sanctions policies and practices on a regular basis?	Yes ☐
122	How often is the Entity audited on its AML, CTF, ABC, Fraud and Sanctions programme by the following:	
122 a	Internal Audit Department	Yearly ☐
122 b	External Third Party	Yearly ☐
123	Does the internal audit function or other independent third party cover the following areas:	
123 a	AML, CTF, ABC, Fraud and Sanctions policy and procedures	Yes ☐
123 b	Enterprise Wide Risk Assessment	Yes ☐
123 c	Governance	Yes ☐
123 d	KYC/CDD/EDD and underlying methodologies	Yes ☐
123 e	Name Screening & List Management	Yes ☐
123 f	Reporting/Metrics & Management Information	Yes ☐
123 g	Suspicious Activity Filing	Yes ☐
123 h	Technology	Yes ☐
123 i	Transaction Monitoring	Yes ☐
123 j	Transaction Screening including for sanctions	Yes ☐
123 k	Training & Education	Yes ☐
123 l	Other (specify)	
124	Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness?	Yes ☐
125	Confirm that all responses provided in the above section are representative of all the LE's branches	Yes ☐
125 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
126	If appropriate, provide any additional information/context to the answers in this section.	
14. FRAUD		
127	Does the Entity have policies in place addressing fraud risk?	Yes ☐
128	Does the Entity have a dedicated team responsible for preventing & detecting fraud?	Yes ☐

129	Does the Entity have real time monitoring to detect fraud?	Yes	☒
130	Do the Entity's processes include gathering additional information to support its fraud controls, for example: IP address, GPS location, and/or device ID?	Yes	☒
131	Confirm that all responses provided in the above section are representative of all the LE's branches	Yes	☒
131 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.		
132	If appropriate, provide any additional information/context to the answers in this section.		

Declaration Statement

Wolfsberg Group Correspondent Banking Due Diligence Questionnaire 2023 (CBDDQ V1.4)

Declaration Statement (To be signed by Global Head of Correspondent Banking or equivalent position holder AND Group Money Laundering Prevention Officer, Global Head of Anti-Money Laundering, Chief Compliance Officer, Global Head of Financial Crimes Compliance OR equivalent)

SIFIN S.R.L. (Financial Institution name) is fully committed to the fight against financial crime and makes every effort to remain in full compliance with all applicable financial crime laws, regulations and standards in all of the jurisdictions in which it does business and holds accounts.

The Financial Institution understands the critical importance of having effective and sustainable controls to combat financial crime in order to protect its reputation and to meet its legal and regulatory obligations.

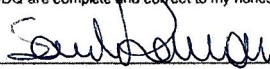
The Financial Institution recognises the importance of transparency regarding parties to transactions in international payments and has adopted/is committed to adopting these standards.

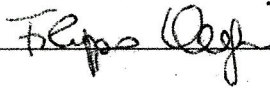
The Financial Institution further certifies it complies with / is working to comply with the Wolfsberg Correspondent Banking Principles and the Wolfsberg Trade Finance Principles. The information provided in this Wolfsberg CBDDQ will be kept current and will be updated no less frequently than every eighteen months.

The Financial Institution commits to file accurate supplemental information on a timely basis.

I, MRS SANDRA ROMANI (Global Head of Correspondent Banking or equivalent), certify that I have read and understood this declaration, that the answers provided in this Wolfsberg CBDDQ are complete and correct to my honest belief, and that I am authorised to execute this declaration on behalf of the Financial Institution.

I, MR FILIPPO ALLEGRI (MLRO or equivalent), certify that I have read and understood this declaration, that the answers provided in this Wolfsberg CBDDQ are complete and correct to my honest belief, and that I am authorised to execute this declaration on behalf of the Financial Institution.

26/09/2025  (Signature & Date)

26/09/2025  (Signature & Date)

