

Financial Institution Name:	Unicredit S.p.A
Location (Country)	Italy, Milan

The questionnaire is required to be answered on a Legal Entity (LE) Level. This means the Financial Institution will answer the questionnaire at an ultimate parent / head office & subsidiary level for which any branches would be considered covered by that parent/subsidiary DDQ. This questionnaire should not cover more than one LE. Each question in the DDQ 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 differed for one of its branches this needs to be highlighted and detail regarding this difference captured at the end of each subsection. If a branch business activity (products offered, client base etc.) is significantly different than its head office, the branch should complete a separate questionnaire.

No#	Question	Answer
1. EN	IITY & OWNERSHIP	
1	Full Legal Name	UniCredit S.p.A
2	Append a list of branches which are covered by this questionnaire	Abu Dhabi, Shanghai, Guangzhou, Paris, Madrid, London, Munich, New York
3	Full Legal (Registered) Address	
	a a a a a a a a a a a a a a a a a a a	Piazza Gae Aulenti, 3 Tower A, 20154 Milan, Italy
4	Full Primary Business Address (if different from above)	Piazza Gae Aulenti, 3 Tower A, 20154 Milan, Italy
5	Date of Entity incorporation/ establishment	01/10/2007
6	Select type of ownership and append an pwnership chart if available	
6 a	Publicly Traded (25% of shares publicly traded)	Yes
6 a1	If Y, indicate the exchange traded on and ticker symbol	Milan stock exchange (UCG), Frankfurt stock exchange (CRI) and Warsaw stock exchange (UCG)
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	There are no shareholders or ultimate beneficial owners with a holding of 10% or more
7	% of the Entity's total shares composed of bearer shares	NO
8	Does the Entity, or any of its branches, operate under an Offshore Banking License (OBL) ?	Yes
8 a	If Y, provide the name of the relevant branch/es which operate under an OBL	UniCredit S.p.A - Abu Dhabi Branch (Branch of Foreign Limited Liability Company)
9	Name of primary financial regulator / supervisory authority	Bank of Italy
10	Provide Legal Entity Identifier (LEI) if available	549300TRUWO2CD2G5692
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11	Provide the full legal name of the ultimate parent	NA.
	(if different from the Entity completing the DDQ)	INA
	(g	
12	Jurisdiction of licensing authority and regulator	NA
	of ultimate parent	
40	0-1	
13	Select the business areas applicable to the	
40 .	Entity Parties	Yes
13 a	Retail Banking	
13 b	Private Banking / Wealth Management	Yes
13 c	Commercial Banking	Yes
13 d	Transactional Banking	Yes
13 e	Investment Banking	Yes
13 f	Financial Markets Trading	Yes
13 g	Securities Services/ Custody	Yes
13 h	Broker/Dealer	Yes
13 i	Multilateral Development Bank	No
13 ј	Other	NA
,		INA
14	Does the Entity have a significant (10% or	
	more) offshore customer base, either by	
	number of customers or by revenues (where off-	No
	shore means not domiciled in the jurisdiction	
	where bank services are being provided)?	
14 a	If Y, provide details of the country and %	
15	Select the closest value:	
15 a	Number of employees	10001+
15 b	Total Assets	Greater than \$500 million
16	Confirm that all responses provided in the	
1 -	above Section ENTITY & OWNERSHIP are	Yes
	representative of all the LE's branches	
16 a	If N, clarify which questions the difference/s	
10 a	relate to and the branch/es that this applies to.	
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16 b	If appropriate, provide any additional	
	information / context to the answers in this	
	section.	
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2. PRODUCTS & SERVICES	
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entities only.	
18 b If appropriate, provide any additional Question n. 17 a.8: Although Unicredit S.p.A. has few existing relationships with MS	th MSRs according to
information / context to the answers in this information / context to the answers in this	
section.	iipo.

19	Does the Entity have a programme that sets	
	minimum AML, CTF and Sanctions standards	
	regarding the following components:	
19 a	Appointed Officer with sufficient	
ı J u	experience/expertise	Yes
19 b	Cash Reporting	Yes
19 c	CDD	Yes
19 d	EDD	Yes
19 e	Beneficial Ownership	Yes
19 f	Independent Testing	Yes
19 q	Periodic Review	Yes
19 g 19 h	Policies and Procedures	Yes
_	Risk Assessment	Yes
19 i	Sanctions	Yes
19 j	PEP Screening	
19 k		Yes
19 I	Adverse Information Screening	Yes
19 m	Suspicious Activity Reporting	Yes
19 n	Training and Education	Yes
19 o	Transaction Monitoring	Yes
20	How many full time employees are in the	
	Entity's AML, CTF & Sanctions Compliance	50+
	Department?	
21	Is the Entity's AML, CTF & Sanctions policy	L.
	approved at least annually by the Board or	Yes
	equivalent Senior Management Committee?	
22	Does the Board or equivalent Senior	
	Management Committee receive regular	Yes
	reporting on the status of the AML, CTF &	
	Sanctions programme?	
23	Does the Entity use third parties to carry out any	
	components of its AML, CTF & Sanctions	Yes
•	programme?	
23 a	If Y, provide further details	There is a Service Level Agreement in place with another entity of Unicredit Group in respect of performing specific AML CTF & Sanctions activities. Unicredit S.p.A. undertakes periodic second level controls under the SLA.
24	Confirm that all responses provided in the above	
	Section AML, CTF & SANCTIONS Programme	Yes
	are Representative of all the LE's branches	
24 a	If N, clarify which questions the difference/s	
	relate to and the branch/es that this applies to.	
	relate to and the prancity of that the applied to	
04 5	If appropriate provide any additional	
24 b	If appropriate, provide any additional information / context to the answers in this	
	section.	

4 AN	TI BRIBERY & CORRUPTION	
4. AN	Has the Entity documented policies and	
23	procedures consistent with applicable ABC	
	regulations and requirements to [reasonably]	Yes
	prevent, detect and report bribery and	165
	corruption?	
26	Does the Entity have an enterprise wide	
	programme that sets minimum ABC standards?	Yes
27	Has the Entity appointed a designated officer or	
	officers with sufficient experience/expertise	
	responsible for coordinating the ABC	Yes
	programme?	
28	Does the Entity have adequate staff with	
	appropriate levels of experience/expertise to	Yes
	implement the ABC programme?	
29	Is the Entity's ABC programme applicable to:	
29 a	Joint ventures	Yes
29 b	Third parties acting on behalf of the Entity	Yes
30	Does the Entity have a global ABC policy that:	
30 a	Prohibits the giving and receiving of bribes?	
	This includes promising, offering, giving,	
	solicitation or receiving of anything of value,	Yes
	directly or indirectly, if improperly intended to	
	influence action or obtain an advantage	
30 b	Includes enhanced requirements regarding	Yes
	interaction with public officials?	162
30 с	Includes a prohibition against the falsification of	
	books and records (this may be within the ABC	Yes
	policy or any other policy applicable to the Legal	165
	Entity)?	
31	Does the Entity have controls in place to	
	monitor the effectiveness of their ABC	Yes
	programme?	
32	Does the Entity's Board or Senior Management	
	Committee receive regular Management	Yes
	Information on ABC matters?	
33	Does the Entity perform an Enterprise Wide	Yes
22 -	ABC risk assessment?	
33 a	If Y select the frequency Does the Entity have an ABC residual risk rating	12 Months
34	that is the net result of the controls	
	effectiveness and the inherent risk	Yes
	assessment?	
	[uoocoombine:	

35	Does the Entity's ABC EWRA cover the inherent risk components detailed below:	
35 a	Potential liability created by intermediaries and other third-party providers as appropriate	Yes
35 b	Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries	Yes
35 с	Transactions, products or services, including thosethat involve state-owned or state-controlled entities or public officials	Yes
35 d	Corruption risks associated with gifts and nospitality, hiring/internships, charitable donations and political contributions	Yes
35 e	Changes in business activities that may materially increase the Entity's corruption risk	Yes
36	Does the Entity's internal audit function or other independent third party cover ABC Policies and Procedures?	Yes
37	Does the Entity provide mandatory ABC training to:	
37 a	Board and Senior Committee Management	Yes
37 b	1st Line of Defence	Yes
37 c	2nd Line of Defence	Yes
37 d	3rd Line of Defence	Yes
37 e	3rd parties to which specific compliance activities subject to ABC risk have been outsourced	Yes
37 f	Non-employed workers as appropriate (contractors/consultants)	No
38	Does the Entity provide ABC training that is targeted to specific roles, responsibilities and activities?	Yes
39	Confirm that all responses provided in the above Section Anti Bribery & Corruption are representative of all the LE's branches	Yes
39 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
39 b	If appropriate, provide any additional information / context to the answers in this section.	
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	46 b		
Section.			
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6 414	L, CTF & SANCTIONS RISK ASSESSMEI	WT
6. AIVI	Does the Entity's AML & CTF EWRA cover the	VI
	inherent risk components detailed below:	Yes
47 a	Client	Yes
47 b	Product	Yes
47 c	Channel	Yes
47 d	Geography	Yes
48	Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below:	
48 a	Transaction Monitoring	Yes
48 b	Customer Due Diligence	Yes
48 c	PEP Identification	Yes
48 d	Transaction Screening	Yes
48 e	Name Screening against Adverse Media & Negative News	Yes
48 f	Training and Education	Yes
48 g	Governance	Yes
48 h	Management Information	Yes
49	Has the Entity's AML & CTF EWRA been completed in the last 12 months?	Yes
49 a	If N, provide the date when the last AML & CTF EWRA was completed.	
50	Does the Entity's Sanctions EWRA cover the inherent risk components detailed below:	
50 a	Client	Yes
50 b	Product	Yes
50 c	Channel	Yes
50 d	Geography	Yes
51	Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below:	
51 a	Customer Due Diligence	Yes
51 b	Transaction Screening	Yes
51 c	Name Screening	Yes
51 d	List Management	Yes
51 e	Training and Education	Yes
51 f	Governance	Yes
51 g	Management Information	Yes
52	Has the Entity's Sanctions EWRA been completed in the last 12 months?	Yes
52 a	If N, provide the date when the last Sanctions EWRA was completed.	
53	Confirm that all responses provided in the above Section AML, CTF & SANCTIONS RISK ASSESSMENT are representative of all the LE's branches	Yes
53 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
53 b	If appropriate, provide any additional information / context to the answers in this section.	

7. KY	C, CDD and EDD	
54	Does the Entity verify the identity of the	
	customer?	Yes
55	Do the Entity's policies and procedures set out	
	when CDD must be completed, e.g. at the time	Yes
	of onboarding or within 30 days	
56	Which of the following does the Entity gather	
	and retain when conducting CDD? Select	
	all that apply:	
56 a	Ownership structure	Yes
56 b	Customer identification	Yes
56 с	Expected activity	Yes
56 d	Nature of business/employment	Yes
56 e	Product usage	Yes
56 f	Purpose and nature of relationship	Yes
56 g	Source of funds	Yes
56 h	Source of wealth	Yes
57	Are each of the following identified:	
57 a	Ultimate beneficial ownership	Yes
57 a1	Are ultimate beneficial owners verified?	Yes
57 b	Authorised signatories (where applicable)	Yes
57 c	Key controllers	Yes
57 d	Other relevant parties	
58	What is the Entity's minimum (lowest) threshold	
	applied to beneficial ownership identification?	10%
		1070
59	Does the due diligence process result in	
	customers receiving a risk classification?	Yes
60	If Y, what factors/criteria are used to determine	
	the customer's risk classification? Select all that	
	apply:	
60 a	Product Usage	Yes
60 b	Geography	Yes
60 с	Business Type/Industry	Yes
60 d	Legal Entity type	Yes
60 e	Adverse Information	Yes
60 f	Other (specify)	

61	Does the Entity have a risk based approach to screening customers for adverse media/negative news?	Yes
62	If Y, is this at:	
62 a	Onboarding	Yes
62 b	KYC renewal	Yes
62 c	Trigger event	Yes
63	What is the method used by the Entity to screen for adverse media / negative news?	
63 a	Automated	
63 b	Manual	
63 c	Combination of automated and manual	Yes
64	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
65	If Y, is this at:	
65 a	Onboarding	Yes
65 b	KYC renewal	Yes
65 с	Trigger event	Yes
66	What is the method used by the Entity to screen PEPs?	
66 a	Automated	
66 b	Manual	
66 с	Combination of automated and manual	Yes
67	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
68	Does the Entity have a process to review and update customer information based on:	
68 a	KYC renewal	Yes
68 b	Trigger event	Yes
69	Does the Entity maintain and report metrics on current and past periodic or trigger event due diligence reviews?	Yes

	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?	
70 a	Non-account customers	None of the above
70 b	Offshore customers	EDD on a risk based approach
70 c	Shell banks	Prohibited
70 d	MVTS/ MSB customers	EDD on a risk based approach
70 e	PEPs	EDD on a risk based approach
70 f	PEP Related	EDD on a risk based approach
70 g	PEP Close Associate	EDD on a risk based approach
70 h	Correspondent Banks	EDD on a risk based approach
70 h1	If EDD or EDD & Restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2014?	Yes
70 i	Arms, defense, military	EDD on a risk based approach
70 j	Atomic power	EDD on a risk based approach
70 k	Extractive industries	EDD on a risk based approach
70 I	Precious metals and stones	EDD on a risk based approach
70 m	Unregulated charities	EDD on a risk based approach
70 n	Regulated charities	EDD on a risk based approach
70 o	Red light business / Adult entertainment	None of the above
70 p	Non-Government Organisations	EDD on a risk based approach
70 q	Virtual currencies	Prohibited
70 r	Marijuana	None of the above
70 s	Embassies/Consulates	EDD on a risk based approach
70 t	Gambling	EDD on a risk based approach
70 u	Payment Service Provider	EDD on a risk based approach
70 v	Other (specify)	Regarding Question 70a above, for Non-Account customers, these are always identified. Above a set threshold, KYC is applied and the transactions are recorded and archived.
71	If restricted, provide details of the restriction	
72	Does the Entity perform an additional control or quality review on clients subject to EDD?	Yes
73	Confirm that all responses provided in the above Section KYC, CDD and EDD are representative of all the LE's branches	Yes
73 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to	
73 b	If appropriate, provide any additional information / context to the answers in this section.	

8 MO	NITORING & REPORTING	
74	Does the Entity have risk based policies,	
	procedures and monitoring processes for the	
	identification and reporting of suspicious	Yes
	activity?	
75	What is the method used by the Entity to	
. •	monitor transactions for suspicious activities?	
	·	
75 a	Automated	
	Manual	
75 b		
75 c	Combination of automated and manual	Yes
76	If manual or combination selected, specify what	Transactions highlighted by the systems need further manual investigation.
	type of transactions are monitored manually	Transaction ingring to a systems need rather mandal invocingation
77	Does the Entity have regulatory requirements to report currency transactions?	
	report currency transactions?	Yes
77 a	If Y, does the Entity have policies, procedures	
-	andprocesses to comply with currency	Yes
	reporting requirements?	160
78	Does the Entity have policies, procedures and	
10	processes to review and escalate matters	
	arising from the monitoring of customer	Yes
	transactions and activity?	
79	Confirm that all responses provided in the	
19	above Section MONITORING & REPORTING	
	are representative of all the LE's branches	Yes
	·	
79 a	If N, clarify which questions the difference/s	
	relate to and the branch/es that this applies to	
79 b	If appropriate, provide any additional	
79 0	information / context to the answers in this	
	section.	
9. PA	YMENT TRANSPARENCY	
80	Does the Entity adhere to the Wolfsberg Group	I
	Payment Transparency Standards?	Yes
81	Does the Entity have policies, procedures and	
	processes to [reasonably] comply with and have	
	controls in place to ensure compliance with:	
81 a	FATF Recommendation 16	Yes
81 b	Local Regulations	
		Yes
81 b1	Specify the regulation	EU Regulation 2015/847 on information accompanying transfers of funds
81 c	If N, explain	
016	in 14, Oxpidin	
82	Does the Entity have processes in place to	
	respond to Request For Information (RFIs) from	
	other entities in a timely manner?	Yes
83	Does the Entity have controls to support the	
	inclusion of required and accurate originator	
	information in international payment messages?	Yes

84	Does the Entity have controls to support the	
	inclusion of required beneficiary in international	
	payment messages?	Yes
	. ,	
85	Confirm that all responses provided in the	
	aboveSection PAYMENT TRANSPARENCY	
	are representative of all the LE's branches	Yes
85 a	If N, clarify which questions the difference/s	
	relate to and the branch/es that this applies to.	
85 b	If appropriate, provide any additional	
	information / context to the answers in this	
	section.	
	ANCTIONS	
86	Does the Entity have a Sanctions Policy	
	approved by management regarding	
	compliance with sanctions law applicable to the	
I	Entity, including with respect its business	Yes
I	conducted with, or through accounts held at	
1	foreign financial institutions?	
	<u> </u>	
<u></u>	D 4 5 6 1	
87	Does the Entity have policies, procedures, or	
1	other controls reasonably designed to prevent	
I	the use of another entity's accounts or services	
	in a manner causing the other entity to violate	
	sanctions prohibitions applicable to the other	Yes
	entity (including prohibitions within the other	
	entity's local jurisdiction)?	
88	Does the Entity have policies, procedures or	
00	other controls reasonably designed to prohibit	
	and/or detect actions taken to evade applicable	
	sanctions prohibitions, such as stripping, or the	Yes
	resubmission and/or masking, of sanctions	
	relevant information in cross border	
	transactions?	
89	Does the Entity screen its customers, including	
	beneficial ownership information collected by	
	the Entity, during onboarding and regularly	Yes
	thereafter against Sanctions Lists?	
90	What is the method used by the Entity?	
	, ,	
90 a	Manual	
90 b	Automated	
90 с	Combination of Automated and Manual	Yes
91	Does the Entity screen all sanctions relevant	
I	data, including at a minimum, entity and	
I	location information, contained in cross border	Yes
	transactions against Sanctions Lists?	
92	What is the method used by the Entity?	
92 a	Manual	
92 b	Automated	Vos
		Yes
92 c	Combination Automated and Manual	
93	Select the Sanctions Lists used by the	
1	Entity in its sanctions screening processes:	
1		
93 a	Consolidated United Nations Security Council	
go a	Sanctions List (UN)	Used for screening customers and beneficial owners and for filtering transactional data
	Cancillia List (CIN)	2000 . 2. 20120111119 Vacioniaro ana pononcial ovincio ana foi intening transactional data
93 b	United States Department of the Treasury's	
ار در	Office of Foreign Assets Control (OFAC)	Used for screening customers and beneficial owners and for filtering transactional data
		J. J
93 с	Office of Financial Sanctions Implementation	
1	HMT (OFSI)	Used for screening customers and beneficial owners and for filtering transactional data
93 d	European Union Consolidated List (EU)	Used for screening customers and beneficial owners and for filtering transactional data
93 e	Lists maintained by other G7 member countries	<u> </u>
33 E	Lists maintained by other G7 member countries	
1		
L		

93 f	Other (specify)	Locally applicable lists in each jurisdiction if foreseen by local legislation.	
94	When new entities and natural persons are added to sanctions lists, how many business days before the Entity updates its lists?	Same day to 2 days	
95	When updates or additions to the Sanctions Lists are made, how many business days before the Entity updates their active manual and / or automated screening system against:		
95 a	Customer Data	Same day to 2 days	
95 b	Transactions	Same day to 2 days	
96	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	
97	Confirm that all responses provided in the above Section SANCTIONS are representative of all the LE's branches	Yes	
97 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.		
97 b	If appropriate, provide any additional information / context to the answers in this section.		
11. TF	RAINING & EDUCATION		
98	Does the Entity provide mandatory training, which includes :		
98 a	Identification and reporting of transactions to government authorities	Yes	
98 b	Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered	Yes	
98 c	Internal policies for controlling money laundering, terrorist financing and sanctions violations	Yes	
98 d	New issues that occur in the market, e.g., significant regulatory actions or new regulations	Yes	
98 e	Conduct and Culture	Yes	
99	Is the above mandatory training provided to :	Yes	
99 a	Board and Senior Committee Management	Yes	
99 b	1st Line of Defence	Yes	
99 c	2nd Line of Defence	Yes	
99 d 99 e	3rd Line of Defence 3rd parties to which specific FCC activities have been outsourced	Yes Yes	
99 f	Non-employed workers (contractors/consultants)	Yes	
100	Does the Entity provide AML, CTF & Sanctions training that is targeted to specific roles, responsibilities and high risk products, services and activities?	Yes	

101	Does the Entity provide customised training for AML, CTF and Sanctions staff?	Yes
102	Confirm that all responses provided in the aboveSection TRAINING & EDUCATION are representative of all the LE's branches	Yes
102 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
102 b	If appropriate, provide any additional information / context to the answers in this section.	
12. QI	JALITY ASSURANCE /COMPLIANCE TE	STING
103	Are the Entity's KYC processes and documents subject to quality assurance testing?	Yes
104	Does the Entity have a program wide risk based Compliance Testing process (separate to the independent Audit function)?	Yes
105	Confirm that all responses provided in the above Section QUALITY ASSURANCE / COMPLIANCE TESTING are representative of all the LE's branches	Yes
105 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
105 b	If appropriate, provide any additional information / context to the answers in this section.	
13. Al	JDIT	
106	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
107	How often is the Entity audited on its AML, CTF & Sanctions programme by the following:	
107 a	Internal Audit Department	Component based reviews
107 b	External Third Party	Component based reviews
	-	

	[D 0 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	
108	Does the internal audit function or other	
	independent third party cover the following areas:	
	lateas.	
108 a	AML, CTF & Sanctions policy and procedures	
		Yes
400 b	IOOO / CODD / EDD and on darking	
108 b	KYC / CDD / EDD and underlying methodologies	Yes
	_	
108 c	Transaction Monitoring	Yes
108 d	Transaction Screening including for sanctions	
100 u	Transaction corconning moraling for carrottens	Yes
	N 0 : 01: (M	
108 e	Name Screening & List Management	Yes
108 f	Training & Education	Yes
108 g	Technology	Yes
108 h	Governance	Yes
108 i	Reporting/Metrics & Management Information	N.
		Yes
108 j	Suspicious Activity Filing	W.
,		Yes
108 k	Enterprise Wide Risk Assessment	V
		Yes
108 I	Other (specify)	
109	Are adverse findings from internal & external	
	audit tracked to completion and assessed for	Yes
	adequacy and completeness?	
110	Confirm that all responses provided in the	
110	above Section, AUDIT are representative of all	
	the LE's branches	Yes
110 a	If N, clarify which questions the difference/s	
	relate to and the branch/es that this applies to.	
110 b	If appropriate, provide any additional	
	information / context to the answers in this	
	section.	
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Declaration Statement

Wolfsberg Group Correspondent Banking Due Diligence Questionnaire 2018 (CBDDQ V1.2)

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)

<u>UniCredit S.p.A.</u> 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.

<u>UniCredit S.p.A.</u> 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.

<u>UniCredit S.p.A.</u> recognises the importance of transparency regarding parties to transactions in international payments and has adopted/is committed to adopting these standards.

<u>UniCredit S.p.A.</u> 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 on an annual basis.

<u>UniCredit S.p.A.</u> commits to file accurate supplemental information on a timely basis.

- I, Alfredo Bresciani (Co Head of Global Transaction Banking), 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 UniCredit S.p.A.
- I, Luca Canestrelli (Co Head of Anti Money Laundering), 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 UniCredit S.p.A.
- I, Roberto Rati (Head of FIG Italy and Southern Europe Network), 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 UniCredit S.p.A.

Alfredo Bresciani		
Luca Canestrelli_	Causal.	25/99/2010
Roberto Rati	1 M. M.	