

**the  
Wolfsberg  
Group**

Financial Institution Name:

CASSA DI RISPARMIO DI ASTI SPA

Location (Country) :

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
<b>1. ENTITY &amp; OWNERSHIP</b>		
1	Full Legal Name	CASSA DI RISPARMIO DI ASTI SPA
2	Append a list of foreign branches which are covered by this questionnaire	All - see attachment
3	Full Legal (Registered) Address	Piazza Libertà, 23 - 14100 ASTI (AT)
4	Full Primary Business Address (if different from above)	//
5	Date of Entity incorporation/ establishment	13/07/1992
6	Select type of ownership and append an ownership chart if available	
6 a	Publicly Traded (25% of shares publicly traded)	Yes <input type="checkbox"/>
6 a1	If Y, indicate the exchange traded on and ticker symbol	HI-MTF - IT0001090783 (Isin code)
6 b	Member Owned/ Mutual	No <input type="checkbox"/>
6 c	Government or State Owned by 25% or more	No <input type="checkbox"/>
6 d	Privately Owned	Yes <input type="checkbox"/>
6 d1	If Y, provide details of shareholders or ultimate beneficial owners with a holding of 10% or more	FONDAZIONE CASSA DI RISPARMIO DI ASTI => 31,80% FONDAZIONE CASSA DI RISPARMIO DI BIELLA => 12,91%
7	% of the Entity's total shares composed of bearer shares	CASSA DI RISPARMIO DI ASTI SPA in not represented by bearer shares
8	Does the Entity, or any of its branches, operate under an Offshore Banking License (OBL) ?	No <input type="checkbox"/>
8 a	If Y, provide the name of the relevant branch/es which operate under an OBL	//
9	Name of primary financial regulator / supervisory authority	BANCA D'ITALIA

10	Provide Legal Entity Identifier (LEI) if available	81560027D07F9BDB8436
11	Provide the full legal name of the ultimate parent (if different from the Entity completing the DDQ)	//
12	Jurisdiction of licensing authority and regulator of ultimate parent	//
13	Select the business areas applicable to the Entity	
13 a	Retail Banking	Yes <input type="checkbox"/>
13 b	Private Banking / Wealth Management	Yes <input type="checkbox"/>
13 c	Commercial Banking	Yes <input type="checkbox"/>
13 d	Transactional Banking	Yes <input type="checkbox"/>
13 e	Investment Banking	No <input type="checkbox"/>
13 f	Financial Markets Trading	Yes <input type="checkbox"/>
13 g	Securities Services / Custody	Yes <input type="checkbox"/>
13 h	Broker / Dealer	No <input type="checkbox"/>
13 i	Multilateral Development Bank	No <input type="checkbox"/>
13 j	Other	Bancassurance (distributor)
14	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 <input type="checkbox"/>
14 a	If Y, provide the top five countries where the non-resident customers are located.	//
15	Select the closest value:	
15 a	Number of employees	1001-5000 <input type="checkbox"/>
15 b	Total Assets	Less than \$10 million <input type="checkbox"/>
16	Confirm that all responses provided in the above Section ENTITY & OWNERSHIP are representative of all the LE's branches	Yes <input type="checkbox"/>
16 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	//
16 b	If appropriate, provide any additional information / context to the answers in this section.	//

2. PRODUCTS & SERVICES		
17	Does the Entity offer the following products and services:	
17 a	Correspondent Banking	Yes
17 a1	If Y	
17 a2	Does the Entity offer Correspondent Banking services to domestic banks?	Yes
17 a3	Does the Entity allow domestic bank clients to provide downstream relationships?	No
17 a4	Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks?	Yes
17 a5	Does the Entity offer correspondent banking services to Foreign Banks?	No
17 a6	Does the Entity allow downstream relationships with Foreign Banks?	No
17 a7	Does the Entity have processes and procedures in place to identify downstream relationships with Foreign Banks?	Yes
17 a8	Does the Entity offer correspondent banking services to regulated MSBs/MVTS?	No
17 a9	Does the Entity allow downstream relationships with MSBs/MVTS?	No
17 a10	Does the Entity have processes and procedures in place to identify downstream relationships with MSB /MVTS?	Yes
17 b	Private Banking (domestic & international)	Yes
17 c	Trade Finance	Yes
17 d	Payable Through Accounts	No
17 e	Stored Value Instruments	No
17 f	Cross Border Bulk Cash Delivery	No
17 g	Domestic Bulk Cash Delivery	No
17 h	International Cash Letter	Yes
17 i	Remote Deposit Capture	No
17 j	Virtual /Digital Currencies	No
17 k	Low Price Securities	No
17 l	Hold Mail	No
17 m	Cross Border Remittances	No
17 n	Service to walk-in customers (non-account holders)	Yes
17 o	Sponsoring Private ATMs	No
17 p	Other high risk products and services identified by the Entity	//
18	Confirm that all responses provided in the above Section PRODUCTS & SERVICES are representative of all the LE's branches	Yes
18 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	//
18 b	If appropriate, provide any additional information / context to the answers in this section.	as for point 17n CDD standard are applied

3. AML, CTF & SANCTIONS PROGRAMME		
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 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 g	Periodic Review	Yes
19 h	Policies and Procedures	Yes
19 i	Risk Assessment	Yes
19 j	Sanctions	Yes
19 k	PEP Screening	Yes
19 l	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 Department?	Less than 10
21	Is the Entity's AML, CTF & Sanctions policy approved at least annually by the Board or equivalent Senior Management Committee?	Yes
22	Does the Board or equivalent Senior Management Committee receive regular reporting on the status of the AML, CTF & Sanctions programme?	Annually
23	Does the Entity use third parties to carry out any components of its AML, CTF & Sanctions programme?	No
23 a	If Y, provide further details	//
24	Confirm that all responses provided in the above Section AML, CTF & SANCTIONS Programme are representative of all the LE's branches	Yes
24 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
24 b	If appropriate, provide any additional information / context to the answers in this section.	//

4. ANTI BRIBERY & CORRUPTION			
25	Has the Entity documented policies and procedures consistent with applicable ABC regulations and requirements to [reasonably] prevent, detect and report bribery and corruption?	Yes	▼
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 programme?	Yes	▼
28	Does the Entity have adequate staff with appropriate levels of experience/expertise to implement the ABC programme?	Yes	▼
29	Is the Entity's ABC programme applicable to:	Both joint ventures and third parties acting on behalf of the Entity	▼
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, directly or indirectly, if improperly intended to influence action or obtain an advantage	Yes	▼
30 b	Includes enhanced requirements regarding interaction with public officials?	Yes	▼
30 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	▼
31	Does the Entity have controls in place to monitor the effectiveness of their ABC programme?	Yes	▼
32	Does the Entity's Board or Senior Management Committee receive regular Management Information on ABC matters?	Yes	▼
33	Does the Entity perform an Enterprise Wide ABC risk assessment?	Yes	▼
33 a	If Y select the frequency	12 Months	▼
34	Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment?	Yes	▼
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 c	Transactions, products or services, including those that involve state-owned or state-controlled entities or public officials	Yes	▼
35 d	Corruption risks associated with gifts and hospitality, 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	No	▼
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.	//	

5. AML, CTF & SANCTIONS POLICIES & PROCEDURES		
40	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report:	
40 a	Money laundering	Yes
40 b	Terrorist financing	Yes
40 c	Sanctions violations	Yes
41	Are the Entity's policies and procedures updated at least annually?	Yes
42	Are the Entity's policies and procedures gapped against/compared to:	
42 a	US Standards	Yes
42 a1	If Y, does the Entity retain a record of the results?	Yes
42 b	EU Standards	Yes
42 b1	If Y, does the Entity retain a record of the results?	Yes
43	Does the Entity have policies and procedures that:	
43 a	Prohibit the opening and keeping of anonymous and fictitious named accounts	Yes
43 b	Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs	Yes
43 c	Prohibit dealing with other entities that provide banking services to unlicensed banks	Yes
43 d	Prohibit accounts/relationships with shell banks	Yes
43 e	Prohibit dealing with another entity that provides services to shell banks	Yes
43 f	Prohibit opening and keeping of accounts for Section 311 designated entities	Yes
43 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
43 h	Assess the risks of relationships with domestic and foreign PEPs, including their family and close associates	Yes
43 i	Define escalation processes for financial crime risk issues	Yes
43 j	Define the process, where appropriate, for terminating existing customer relationships due to financial crime risk	Yes
43 k	Specify how potentially suspicious activity identified by employees is to be escalated and investigated	Yes
43 l	Outline the processes regarding screening for sanctions, PEPs and negative media	Yes
43 m	Outline the processes for the maintenance of internal "watchlists"	Yes
44	Has the Entity defined a risk tolerance statement or similar document which defines a risk boundary around their business?	Yes
45	Does the Entity have a record retention procedures that comply with applicable laws?	Yes
45 a	If Y, what is the retention period?	5 years or more
46	Confirm that all responses provided in the above Section POLICIES & PROCEDURES are representative of all the LE's branches	Yes
46 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	//
46 b	If appropriate, provide any additional information / context to the answers in this section.	//



6. AML, CTF & SANCTIONS RISK ASSESSMENT		
47	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:	
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. KYC, 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 of onboarding or within 30 days	Yes
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 c	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	Yes
58	What is the Entity's minimum (lowest) threshold applied to beneficial ownership identification ?	Other (Specify the percentage) over 25%
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	<input type="checkbox"/>
60 b	Geography	Yes	<input type="checkbox"/>
60 c	Business Type/Industry	Yes	<input type="checkbox"/>
60 d	Legal Entity type	Yes	<input type="checkbox"/>
60 e	Adverse Information	Yes	<input type="checkbox"/>
60 f	Other (specify)	type and size of transactions	
61	Does the Entity have a risk based approach to screening customers for adverse media/negative news?	Yes	<input type="checkbox"/>
62	If Y, is this at:		
62 a	Onboarding	Yes	<input type="checkbox"/>
62 b	KYC renewal	Yes	<input type="checkbox"/>
62 c	Trigger event	Yes	<input type="checkbox"/>
63	What is the method used by the Entity to screen for adverse media / negative news?	Combination of automated and manual	<input type="checkbox"/>
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?		
65	If Y, is this at:		
65 a	Onboarding	Yes	<input type="checkbox"/>
65 b	KYC renewal	Yes	<input type="checkbox"/>
65 c	Trigger event	Yes	<input type="checkbox"/>
66	What is the method used by the Entity to screen PEPs?	Combination of automated and manual	<input type="checkbox"/>
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	<input type="checkbox"/>
68	Does the Entity have a process to review and update customer information based on:		
68 a	KYC renewal	Yes	<input type="checkbox"/>
68 b	Trigger event	Yes	<input type="checkbox"/>
69	Does the Entity maintain and report metrics on current and past periodic or trigger event due diligence reviews?	Yes	<input type="checkbox"/>

70	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	EDD on a risk based approach	▼
70 b	Non-resident customers	EDD on a risk based approach	▼
70 c	Shell banks	Prohibited	▼
70 d	MVTS/ MSB customers	Prohibited	▼
70 e	PEPs	EDD & restricted on a risk based approach	▼
70 f	PEP Related	EDD & restricted on a risk based approach	▼
70 g	PEP Close Associate	EDD & restricted on a risk based approach	▼
70 h	Correspondent Banks	EDD & restricted 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 & restricted on a risk based approach	▼
70 j	Atomic power	Prohibited	▼
70 k	Extractive industries	EDD & restricted on a risk based approach	▼
70 l	Precious metals and stones	EDD & restricted on a risk based approach	▼
70 m	Unregulated charities	EDD & restricted on a risk based approach	▼
70 n	Regulated charities	EDD & restricted on a risk based approach	▼
70 o	Red light business / Adult entertainment	EDD & restricted on a risk based approach	▼
70 p	Non-Government Organisations	EDD & restricted on a risk based approach	▼
70 q	Virtual currencies	Prohibited	▼
70 r	Marijuana	Prohibited	▼
70 s	Embassies/Consulates	EDD & restricted on a risk based approach	▼
70 t	Gambling	EDD & restricted on a risk based approach	▼
70 u	Payment Service Provider	EDD & restricted on a risk based approach	▼
70 v	Other (specify)	//	
71	If restricted, provide details of the restriction	Pursuant to Bank's policy restrictions are posed in absence of regular requested documents or in case of suspected activities / account movements. Cassa di Risparmio di Asti Spa avoid being involved in activities with entities which could violate human right, dangerous to health, people and nature.	
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. MONITORING & REPORTING		
74	Does the Entity have risk based policies, procedures and monitoring processes for the identification and reporting of suspicious activity?	Yes
75	What is the method used by the Entity to monitor transactions for suspicious activities?	Combination of automated and manual
76	If manual or combination selected, specify what type of transactions are monitored manually	transactions and customers highlighted by the systems require further manual investigation for subsequent reporting
77	Does the Entity have regulatory requirements to report suspicious transactions?	Yes
77 a	If Y, does the Entity have policies, procedures and processes to comply with suspicious transaction reporting requirements?	Yes
78	Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity?	Yes
79	Confirm that all responses provided in the 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 information / context to the answers in this section.	//

9. PAYMENT TRANSPARENCY		
80	Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards?	Yes <input type="button" value="v"/>
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 <input type="button" value="v"/>
81 b	Local Regulations	Yes <input type="button" value="v"/>
81 b1	Specify the regulation	Regulation UE 2015/847 of the European Parliament and of the Council of 20 May 2015 on information accompanying transfers of funds and subsequent amendments
81 c	If N, explain	//
82	Does the Entity have processes in place to respond to Request For Information (RFIs) from other entities in a timely manner?	Yes <input type="button" value="v"/>
83	Does the Entity have controls to support the inclusion of required and accurate originator information in international payment messages?	Yes <input type="button" value="v"/>
84	Does the Entity have controls to support the inclusion of required beneficiary information international payment messages?	Yes <input type="button" value="v"/>
85	Confirm that all responses provided in the above Section PAYMENT TRANSPARENCY are representative of all the LE's branches	Yes <input type="button" value="v"/>
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.	//

10. SANCTIONS			
86	Does the Entity have a Sanctions Policy approved by management regarding compliance with sanctions law applicable to the Entity, including with respect its business conducted with, or through accounts held at foreign financial institutions?	Yes	▼
87	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	▼
88	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	▼
89	Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists?	Yes	▼
90	What is the method used by the Entity?	Automated	▼
91	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	▼
92	What is the method used by the Entity?	Automated	▼
93	Select the Sanctions Lists used by the Entity in its sanctions screening processes:		
93 a	Consolidated United Nations Security Council Sanctions List (UN)	Used for screening customers and beneficial owners and for filtering transactional data	▼
93 b	United States Department of the Treasury's Office of Foreign Assets Control (OFAC)	Used for screening customers and beneficial owners and for filtering transactional data	▼
93 c	Office of Financial Sanctions Implementation 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	Used for screening customers and beneficial owners and for filtering transactional data	▼
93 f	Other (specify)	//	
94	Question removed		
95	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:		
95 a	Customer Data	Same day to 2 business days	▼
95 b	Transactions	Same day to 2 business 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. TRAINING & 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 :	
99 a	Board and Senior Committee Management	Yes
99 b	1st Line of Defence	Yes
99 c	2nd Line of Defence	Yes
99 d	3rd Line of Defence	Yes
99 e	3rd parties to which specific FCC activities have been outsourced	Not Applicable
99 f	Non-employed workers (contractors/consultants)	No
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 above Section 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. QUALITY ASSURANCE /COMPLIANCE TESTING			
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. AUDIT		
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	Yearly
107 b	External Third Party	Component based reviews
108	Does the internal audit function or other independent third party cover the following areas:	
108 a	AML, CTF & Sanctions policy and procedures	Yes
108 b	KYC / CDD / EDD and underlying methodologies	Yes
108 c	Transaction Monitoring	Yes
108 d	Transaction Screening including for sanctions	Yes
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	Yes
108 j	Suspicious Activity Filing	Yes
108 k	Enterprise Wide Risk Assessment	Yes
108 l	Other (specify)	//
109	Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness?	Yes
110	Confirm that all responses provided in the 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.	//

**Declaration Statement**

Wolfsberg Group Correspondent Banking Due Diligence Questionnaire 2020 (CBDDQ V1.3)  
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)

CASSA DI RISPARMIO DI ASTI SPA \_\_\_\_\_ (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 on an annual basis.

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

GIOVANNI BONFANTI \_\_\_\_\_ (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.

GIULIANA SCOTTI \_\_\_\_\_ (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.

Asti, 15 february 2023 \_\_\_\_\_ (Signature & Date)

Asti, 15 february 2023 \_\_\_\_\_ (Signature & Date)

*Il Responsabile*

## List of branches updated feb 2023

Branch nr.	Branch	Address	Prov
1	Sede di Asti	Via Giardini, 1	AT
2	Agenzia di Città n. 2	Piazza 1° Maggio, 3	AT
3	Filiale di AGLIANO	Via Mazzini, 2	AT
4	Filiale di BALDICHIERI D'ASTI	Via Roma, 7	AT
5	Filiale di BUBBIO	Piazza delle Scuole, 1	AT
6	Filiale di CALLIANO	Via Roma, 2	AT
7	Filiale di CASTAGNOLE LANZE	Via Tagliaferro, 1	AT
8	Filiale di CASTELL'ALFERO	Via Roma, 19	AT
9	Filiale di CASTELLO D'ANNONE	Piazza Medici, 5	AT
10	Filiale di CASTELNUOVO BELBO	Via Mazzini, 2	AT
12	Filiale di COSTIGLIOLE D'ASTI	Piazza Umberto I, 29	AT
14	Filiale di GRAZZANO BADOGLIO	Via IV Novembre, 12	AT
15	Filiale di ISOLA D'ASTI	Via Generale Volpini, 215	AT
16	Filiale di MONALE	Piazza Vittorio Emanuele, 12	AT
17	Filiale di MONASTERO BORMIDA	Via Verdi, 25	AT
18	Filiale di MONCALVO	Via Cissello, 13	AT
19	Filiale di MONTEMAGNO	Piazza Umberto I, 23	AT
20	Filiale di MOTTA	Via Scotti, 41	AT
21	Filiale di PIOVA' MASSAIA	Via Asti-Chivasso, 15.A	AT
22	Filiale di REFRANCORE	Via Asti, 34	AT
23	Filiale di ROCCA D'ARAZZO	Via Garibaldi, 68	AT
24	Filiale di ROCCHETTA TANARO	Piazza Italia, 2	AT
25	Filiale di SAN DAMIANO D'ASTI	Piazza Libertà, 3	AT
26	Filiale di SETTIME	Fraz. Maridiana, 9	AT
27	Filiale di TIGLIOLE	Piazza Regina Margherita, 5	AT
29	Filiale di VESIME	Via Delprino, 25	AT
30	Filiale di VIGLIANO D'ASTI	Via Provinciale, 5	AT
31	Filiale di VILLAFRANCA D'ASTI	Piazza Santanera, 16	AT
32	Agenzia di Città n. 3	Corso Torino, 185	AT
33	Filiale di BOGLIETTO	Via G. Cora, 1	AT
35	Agenzia di Città n. 4	Corso Matteotti, 197	AT
36	Filiale di VAGLIERANO	Via Roma, 39	AT
37	Filiale di CANELLI	Piazza Carlo Gancia, 10	AT
38	Filiale di REVIGLIASCO D'ASTI	Piazza Vittorio Veneto, 4	AT
39	Agenzia di Città n. 5	Corso Savona, 200-202	AT
40	Filiale di ANTIGNANO	Piazza IV Novembre, 2	AT
41	Filiale di BUTTIGLIERA D'ASTI	Via Cavour, 1	AT
43	Filiale di CISTERNA	Via Alfieri, 2	AT
44	Filiale di FERRERE	Strada Provinciale per Torino, 69	AT
45	Filiale di MOMBERCELLI	Piazza Alfieri, 24	AT
46	Filiale di MONGARDINO	Piazza IV Novembre, 3	AT
47	Filiale di MONTECHIARO D'ASTI	Via Roma, 21	AT
48	Filiale di PORTACOMARO	Piazza Marconi, 12	AT
49	Filiale di QUARTO D'ASTI	Via Antica Dogana, 6/A	AT
50	Filiale di SAN MARTINO ALFIERI	Piazza Alfieri, 5	AT
52	Filiale di ROBELLA	Via Torino, 24 ter	AT
53	Agenzia di Città n. 6	Piazza V. Veneto, 4	AT
55	Filiale di VALLEVERSA	Via Statale, 119	AT
58	Filiale di VILLANOVA D'ASTI	Via Roma, 29	AT
59	Agenzia di Città n. 7	Corso Alessandria, 192	AT
60	Filiale di NIZZA MONFERRATO	Piazza Martiri di Alessandria, 8	AT
61	Filiale di ANDEZENO	Corso Vittorio Emanuele, 2	TO
62	Filiale di ALBA	Viale Vico, 14/A	CN
63	Filiale di COCCONATO	Corso Pinin Giachino, 13	AT
65	Filiale di QUATTORDIO	Via Garavelli, 4	AL
66	Filiale di MONCALIERI	Strada Genova, 149	TO
67	Filiale di LAURIANO	Piazza Risorgimento, 2	TO
68	Agenzia di Città n. 9	Corso Casale, 316	AT

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69	Filiale di CAVAGNOLO	Piazza V. Veneto, 8	TO
70	Filiale di ROSIGNANO M.TO	Via Mazzini, 17	AL
71	Filiale di RIVA PRESSO CHIERI	Via Canta, 11	TO
73	Filiale di INCISA SCAPACCINO	Via Dante, 5	AT
79	Agenzia di Città n. 8	Corso Alfieri, 326	AT
81	Filiale di PESCHIERA BORROMEO	Via Turati, 14/C	MI
83	Agenzia di Città n. 13	Via Ugo Foscolo, 13	AT
84	Filiale di CASALE MONFERRATO	Corso Indipendenza, 31	AL
85	Filiale di MOMBARUZZO	Via Saracco, 7	AT
86	Filiale di ACQUI TERME	Piazza Matteotti, 35	AL
87	Filiale di SETTIMO TORINESE	Via Giannone, 12	TO
88	Filiale di CASTAGNITO	Via Alba, 12	CN
89	Filiale di RIVOLI	Corso Susa, 165/A	TO
91	Filiale di CASTELNUOVO DON BOSCO	Viale Europa, 5	AT
92	Filiale di CALAMANDRANA	Via Roma, 109	AT
94	Filiale di GALLO DI GRINZANE CAVOUR	Via Garibaldi, 141 Fraz. Gallo d'Alba	CN
95	Filiale di CARMAGNOLA	Via San Francesco di Sales, 58/2	TO
96	Filiale di CAMBIANO	Via Nazionale, 71	TO
98	Filiale di SEGRATE	Via Circonvallazione, 6	MI
101	Filiale di NOVI LIGURE	Piazza Indipendenza, 5	AL
103	Filiale di CHIERI	Piazza Europa, 23	TO
104	Filiale di ALESSANDRIA	Via Cavour, 80	AL
105	Filiale di COLLEGNO	Corso Francia, 141 angolo Via Bolzano	TO
106	Filiale di CHIVASSO	Piazza d'Armi, 3	TO
107	Filiale di ORBASSANO	Via Torino, 8	TO
108	Filiale di MONCALIERI 2	Via Martiri della Libertà, 9	TO
109	Filiale di NOVATE MILANESE	Largo Padre Ambrogio Fumagalli, 1	MI
110	Filiale di SANTO STEFANO BELBO	Corso Piave ang. Via XXV Aprile	CN
111	Filiale di TORTONA	Corso Montebello, 1 ang. Largo Borgarelli, 7	AL
113	Filiale di BUCCINASCO	Via Lomellina,10/6	MI
114	Filiale di TORINO	Corso Re Umberto, 31 ang. Corso Stati Uniti	TO
115	Filiale di TORINO 2	Via Nizza, 193	TO
116	Filiale di CANALE	Via Roma, 100	CN
117	Agenzia OSPEDALE	Corso Dante, 202	AT
118	Filiale di MONZA	Corso Milano ang. Via Cairoli	MB
120	Filiale di SAVIGLIANO	Piazza Schiapparelli, 12	CN
121	Filiale di FOSSANO	Piazza Beppe Manfredi, 10	CN
122	Filiale di TORINO 3	Piazza Adriano, 15	TO
123	Filiale di TORINO 4	Corso Francia, 319/C	TO
125	Filiale di LISSONE	Via Matteotti, 55/b	MB
126	Filiale di SALUZZO	Via Bagni, 1/B	CN
127	Filiale di BRUGHERIO	Viale Lombardia, 124	MB
128	Filiale di CERNUSCO SUL NAVIGLIO	Viale Assunta, 101	MI
129	Filiale di ARCORE	Via Casati, 55/57	MB
130	Filiale di CIRIE'	Via Trivero 19/A	TO
131	Filiale di SESTO SAN GIOVANNI	Via Garibaldi ang. Viale Casiraghi	MI
132	Filiale di BRESCO	Via Vittorio Veneto, 16	MI
133	Filiale di TORINO 7	Corso San Maurizio, 69	TO
135	Filiale di CESANO BOSCONI	Via Isonzo, 12	MI
136	Filiale di RHO	Piazza Visconti, 16	MI
137	Filiale di TORINO 5	Via Cibrario, 6	TO
138	Filiale di TORINO 6	Via Chiesa della Salute, 48	TO
139	Filiale di CUNEO	Corso Nizza, 58/62	CN
140	Filiale di MONDOVI'	Piazza Marco Levi, 3	CN
141	Filiale di DOGLIANI	Via Torino, 118B	CN
142	Filiale di VALENZA	Corso Garibaldi, 109/E	AL
144	Filiale di GRUGLIASCO	Piazza Marconi, 7	TO
145	Filiale di VOGHERA	Via XX Settembre, 30	PV
146	Filiale di BRA	Piazza Roma, 40	CN
147	Filiale di PAVIA	Viale Giacomo Matteotti, 18	PV
148	Filiale di GENOVA	Via Brigata Liguria, 58	GE

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149	Filiale di BRESCIA	Via XXV Aprile, 26/A	BS
150	Filiale di MILANO	Via Manzoni, 12	MI
151	Filiale di PADOVA	Via Verdi, 5	PD
152	Filiale di BERGAMO	Via Zambonate, 28	BG
153	Filiale di VERONA	Via Paglieri, 1	VR
154	Filiale di DESENZANO	Viale Cavour, 33	BS
155	Filiale di TREVISO	Borgo Giuseppe Mazzini, 46	TV
156	Filiale di BISTAGNO	Corso Italia, 16	AL
157	Filiale di VENEZIA MESTRE	Piazza XXVII Ottobre, 33	VE
161	Filiale di BIELLA PRINCIPALE	Via Gramsci, 16	BI
162	Filiale di PONDERANO SPORTELO OSPEDALE	Via Dei Ponderanesi, 2	BI
163	Filiale di BIELLA Agenzia n. 3	Via Dante, 4	BI
165	Filiale di BIELLA Agenzia n. 1	Via Torino 58	BI
167	Filiale di BIELLA Agenzia n. 4	Via Fratelli Rosselli, 112	BI
168	Filiale di SCOPELLO	via Statale, 7/B	VC
170	Filiale di ANDORNO / SAGLIANO MICCA	Via Cappellaro, 24	BI
172	Filiale di BRUSNENGO	C.so Libertà, 56	Bi
176	Filiale di CANDELO	Via Matteotti, 53	BI
177	Filiale di CAVALLIRIO	P.zza Martiri della Libertà	NO
178	Filiale di CAVAGLIA <sup>1</sup>	Via Vercellone, 9	BI
180	Filiale di BIELLA Agenzia n. 2	P.zza XXV Aprile 11/B	BI
182	Filiale di COGGIOLA	V. Roma, 40	BI
184	Filiale di COSSATO	Via Marconi, 8	BI
186	Filiale di CREVACUORE	Via Garibaldi, 65	BI
188	Filiale di GRAGLIA	P.zza Crida, 3	BI
189	Filiale di GAGLIANICO	Via Matteotti, 45	BI
190	Filiale di MASSERANO	P.zza Mercato, 1	BI
192	Filiale di MONGRANDO	Via Roma, 42	BI
194	Filiale di MOTTALCIATA	Via Martiri Libertà, 18	BI
196	Filiale di OCCHIEPPO INFERIORE	Via Repubblica, 9	BI
197	Filiale di TOLLEGNO	Via Garibaldi, 11	BI
198	Filiale di PETTINENGO	Via Roma, 2	BI
199	Filiale di PRALUNGO	Via Serratrice, 1	BI
200	Filiale di PRAY	Via B. Sella, 87/A	BI
202	Filiale di SANDIGLIANO	P.zza Don Minzoni, 16	BI
203	Filiale di TORINO AGENZIA N. 8	Via Luigi Des Ambrois, 5	TO
204	Filiale di PONZONE/TRIVERO	Via Provinciale, 195/A	BI
206	Filiale di VALLE MOSSO	Via Roma, 29	BI
207	Filiale di VERRONE	Via XXV Aprile, 2	BI
208	Filiale di VIGLIANO BIELLESE	Via Milano, 152	BI
209	Filiale di VALDENGO	Via Roma, 81	BI
210	Filiale di VERCELLI AGENZIA N. 6	Corso Prestinari 12	VC
213	Filiale di SALUGGIA	Via Lusani 2	VC
217	Filiale di SANTHIA <sup>1</sup>	Corso Nuova Italia 28	VC
221	Filiale di BIELLA AGENZIA N. 8	Via Lamarmora 1/B	BI
222	Filiale di AOSTA	Corso Battaglione Aosta 2	AO
223	Filiale di COURMAYEUR	Via Circonvallazione, 84	AO
224	Filiale di SAINT VINCENT	Via Emilio Chanoux, 57	AO
240	Filiale di SERRAVALLE SESIA	Corso Matteotti 252	VC
241	Filiale di STRAMBINO	Piazza Repubblica 16/e	TO
242	Filiale di STROPPIANA	Via Mazzini 36	VC
243	Filiale di TRINO	Piazza Mazzini 3	VC
244	Filiale di VARALLO	Piazza V. Emanuele II, 22	VC
245	Filiale di VILLATA	Via Vittorio Veneto 33	VC
246	Filiale di NOVARA AGENZIA N. 1	Piazza F.lli Bandiera, 21	NO
248	Filiale di ABBIATEGRASSO	Corso San Martino, 85	MI
249	Filiale di PALAZZOLO VERCELLESE	Corso Italia 21	VC
250	Filiale di VERCELLI FILIALE PRINCIPALE	Via S. Cristoforo 9	VC
254	Filiale di BORGARO TORINESE	Via Lanzo, 173	TO
256	Filiale di BORGOMANERO	Viale A. Marazza, 34	NO
257	Filiale di BUSTO ARSIZIO	Via Bramante, 6	VA

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258	Filiale di CASTELLETO SOPRA TICINO	Via Caduti per la Liberta', 160/B	NO
259	Filiale di VERCELLI AGENZIA N. 1	Piazza Zumaglini 16	VC
260	Filiale di VERCELLI AGENZIA N. 3	Via Thaon de Revel 35 - Cappuccini	VC
262	Filiale di CERRINA MONFERRATO	Via Nazionale, 91	AL
263	Filiale di ARBORIO	Piazza S. Maria 1	VC
265	Filiale di ASIGLIANO VERCELLESE	Via XXIV Maggio 1	VC
266	Filiale di BIANZE'	Piazza S. Eusebio 8	VC
268	Filiale di BORGO D'ALE	Piazza Caduti 7	VC
269	Filiale di CALUSO	Via Montello, 15	TO
270	Filiale di GALLARATE	Via Cavour, 6	VA
272	Filiale di CIGLIANO	Corso Umberto I° 54	VC
275	Filiale di BORGOSesia	Via XX Settembre 27	VC
276	Filiale di LEGNANO	Corso Italia, 22	MI
277	Filiale di NOVARA	Corso XXIII Marzo, 29/31	NO
278	Filiale di BORGO VERCELLI	Via Tavallini 18	VC
280	Filiale di BURONZO	Corso Umberto I 26	VC
282	Filiale di CARESANABLOT	Via Vercelli 25	VC
284	Filiale di TRECATE	Via Matteotti, 49	NO
285	Filiale di CRESCENTINO	Piazza A. Caretto 1	VC
286	Filiale di DESANA	Piazza Cavour 1	VC
287	Filiale di GATTINARA	Corso Garibaldi 83/85	VC
290	Filiale di IVREA	Corso Costantino Nigra 37/A	TO
291	Filiale di LENTA	Via Roma	VC
292	Filiale di VENARIA REALE	Via Mensa, 10	TO
293	Filiale di VERBANIA	Viale G. Azari, 40 (Fraz. Pallanza)	VB
295	Filiale di LIVORNO FERRARIS	Piazza G. Ferraris 32	VC
296	Filiale di RONSECCO	Piazza V. Veneto 5	VC
297	Filiale di QUARONA	Piazza Combattenti 15	VC
299	Filiale di PEZZANA	Corso Matteotti 85	VC