



Banco di Desio e della Brianza S.p.A.

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Partita IVA n. 00705680965  
Iscritta nel Registro delle Imprese di Monza e Brianza  
Capitale sociale Euro 67.705.040,00, i.v.

Aderente al Fondo Interbancario di Tutela dei Depositi e al Fondo Nazionale di Garanzia, iscritta all'Albo delle Banche al cod. ABI n. 34405 e Capogruppo del Gruppo Bancario Banco di Desio e della Brianza, iscritto all'Albo dei Gruppi Bancari al n. 34405

Desio, 28th January 2013

**TO WHOM IT MAY CONCERN**

**Subject: Anti-Money Laundering Statement**

We, BANCO DI DESIO E DELLA BRIANZA SPA, having our registered head office in Desio (MB - Italy), Via Rovagnati 1, hereby declare that we are subject to applicable Italian Law and Regulations (Legislative Decrees 231/2007 and 109/2007).

Our country has established laws aimed at preventing money laundering, and we confirm we meet all regulatory requirements.

We are operating under the authorization and supervision of BANCA d'ITALIA (domestic regulator Authority), UIF (domestic Financial Intelligence Unit – branch of BANCA d'ITALIA) and CONSOB (the Public Authority responsible for regulating the Italian securities market), being our shares listed on the Milan Stock Exchange.

We are compliant with Directive 2005/60/EC of the European Parliament and the Council (the Third Anti-Money Laundering Directive) implemented by European Commission Directive 2006/70/EC, to prevent and combat money laundering and terrorist financing.

We confirm we have in place policies and procedures on Anti-Money Laundering (incorporating detailed KYC procedures) as well as auditing and reporting functions and employees' training programs.

We also confirm that we do not provide any kind of services to any shell bank, as per USA Patriot Act requirements.

Sincerely Yours.

ANTI-MONEY LAUNDERING MANAGER

(Mr. Andrea Sambruni)

MANAGING DIRECTOR

(Mr. Tommaso Cartone)



**Financial Institution Name: BANCO DI DESIO E DELLA BRIANZA SPA**

**Location: Via E. Rovagnati, 1 – 20832 Desio (MB) Italy**

## Anti-Money Laundering Questionnaire

If you answer "no" to any question, additional information can be supplied at the end of the questionnaire.

<b>I. General AML Policies, Practices and Procedures:</b>	<u>Yes</u>	<u>No</u>
1. Is the AML compliance program approved by the FI's board or a senior committee?	X	N o
2. Does the FI have a legal and regulatory compliance program that includes a designated officer that is responsible for coordinating and overseeing the AML framework?	X	N o
3. Has the FI developed written policies documenting the processes that they have in place to prevent, detect and report suspicious transactions?	X	N o
4. In addition to inspections by the government supervisors/regulators, does the FI client have an internal audit function or other independent third party that assesses AML policies and practices on a regular basis?	X	N o
5. Does the FI have a policy prohibiting accounts/relationships with shell banks? ( <i>A shell bank is defined as a bank incorporated in a jurisdiction in which it has no physical presence and which is unaffiliated with a regulated financial group.</i> )	X	N o
6. Does the FI have policies to reasonably ensure that they will not conduct transactions with or on behalf of shell banks through any of its accounts or products?	X	N o
7. Does the FI have policies covering relationships with Politically Exposed Persons (PEP's), their family and close associates?	X	N o
8. Does the FI have record retention procedures that comply with applicable law?	X	N o
9. Are the FI's AML policies and practices being applied to all branches and subsidiaries of the FI both in the home country and in locations outside of that jurisdiction?	Y o	X
<b>II. Risk Assessment</b>	<u>Yes</u>	<u>No</u>
10. Does the FI have a risk-based assessment of its customer base and their transactions?	X	N o
11. Does the FI determine the appropriate level of enhanced due diligence necessary for those categories of customers and transactions that the FI has reason to believe pose a heightened risk of illicit activities at or through the FI?	X	N o
<b>III. Know Your Customer, Due Diligence and Enhanced Due Diligence</b>	<u>Yes</u>	<u>No</u>
12. Has the FI implemented processes for the identification of those customers on whose behalf it maintains or operates accounts or conducts transactions?	X	N o

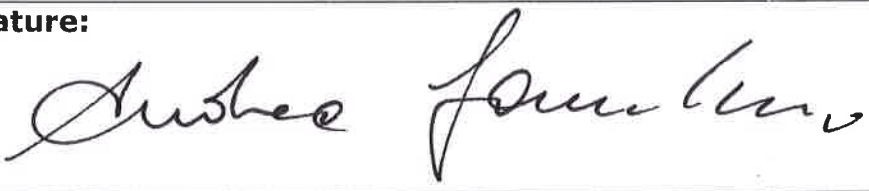
13. Does the FI have a requirement to collect information regarding its customers' business activities?	X	No
14. Does the FI assess its FI customers' AML policies or practices?	X	No
15. Does the FI have a process to review and, where appropriate, update customer information relating to high risk client information?	X	No
16. Does the FI have procedures to establish a record for each new customer noting their respective identification documents and 'Know Your Customer' information?	X	No
17. Does the FI complete a risk-based assessment to understand the normal and expected transactions of its customers?	X	No
<b>IV. Reportable Transactions and Prevention and Detection of Transactions with Illegally Obtained Funds</b>	<b>Yes</b>	<b>No</b>
18. Does the FI have policies or practices for the identification and reporting of transactions that are required to be reported to the authorities?	X	No
19. Where cash transaction reporting is mandatory, does the FI have procedures to identify transactions structured to avoid such obligations?	X	No
20. Does the FI screen customers and transactions against lists of persons, entities or countries issued by government/competent authorities?	X	No
21. Does the FI have policies to reasonably ensure that it only operates with correspondent banks that possess licenses to operate in their countries of origin?	X	No
<b>V. Transaction Monitoring</b>	<b>Yes</b>	<b>No</b>
22. Does the FI have a monitoring program for unusual and potentially suspicious activity that covers funds transfers and monetary instruments such as travelers checks, money orders, etc?	X	No
<b>VI. AML Training</b>	<b>Yes</b>	<b>No</b>
23. Does the FI provide AML training to relevant employees that includes: <ul style="list-style-type: none"> <li>▪ Identification and reporting of transactions that must be reported to government authorities.</li> <li>▪ Examples of different forms of money laundering involving the FI's products and services.</li> <li>▪ Internal policies to prevent money laundering.</li> </ul>	X	No
24. Does the FI retain records of its training sessions including attendance records and relevant training materials used?	X	No
25. Does the FI communicate new AML related laws or changes to existing AML related policies or practices to relevant employees?	X	No
26. Does the FI employ third parties to carry out some of the functions of the FI?	Yes	X
27. If the answer to question 26 is yes, does the FI provide AML training to relevant third parties that includes: <ul style="list-style-type: none"> <li>▪ Identification and reporting of transactions that must be reported to government authorities.</li> <li>▪ Examples of different forms of money laundering involving the FI's products and services.</li> <li>▪ Internal policies to prevent money laundering.</li> </ul>		No

The Wolfsberg Group consists of the following leading international financial institutions: Banco Santander, Bank of Tokyo-Mitsubishi UFJ, Barclays, Citigroup, Credit Suisse, Deutsche Bank, Goldman Sachs, HSBC, JP Morgan Chase, Société Générale and UBS which aim to develop financial services industry standards, and related products, for Know Your Customer, Anti-Money Laundering and Counter Terrorist Financing policies.

Space for additional information:  
(Please indicate which question the information is referring to.)

The answer to question no. 9: AML policies and practices are applied to our fully owned subsidiary BANCO DESIO LAZIO SPA – Swift code DELZITR1.

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<b>Name:</b>	<b>Andrea SAMBRUNI</b>
<b>Title:</b>	<b>ANTI-MONEY LAUNDERING MANAGER</b>
<b>Signature:</b>	
<b>Date:</b>	<b>28<sup>TH</sup> January 2013</b>

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