

UniCredit S.p.A.

Anti-Money Laundering and Counter Terrorism Financing Questionnaire
 (The answers of this Questionnaire are related to UniCredit SpA only)

CORRESPONDENT INFORMATION	
1.1) Full name of the bank: UniCredit SpA	
1.2) Registered address: Via Alessandro Specchi, 16 00186 Rome - Italy General Management: Piazza Cordusio 20123 Milan - Italy	
1.3) Telephone and web address: +39 02 88 621 www.unicreditgroup.eu	
1.4) Country of incorporation: Italy	
1.5) Registration/License no: Banking Group Register No. 3135.1	
1.6) Principal place of business: Italy	
1.7) Principal banking activities: Group Treasury Global transaction banking	
1.8) General Counsel and Group Compliance Officer	Name: Faruque Nadine
1.9) Key contact person	Name: Title: Address: Telephone: e-mail:

OWNERSHIP, MANAGEMENT AND REGULATORY INFORMATION		
Question	Yes	No
2.1) Is your bank a: private company? government-owned company?	√	√
2.2) Is your bank listed on any stock exchange?	√	
2.3) If yes on which stock exchange are the shares listed and which is the symbol? Milan stock exchange (UCG), Frankfurt stock exchange (CRI) and Warsaw stock exchange (UCG)		

2.4) List of members of senior management: Please Download the information from the web-site www.unicreditgroup.eu (GOVERNANCE>MANAGEMENT).		
2.5) List of members of the board of directors: Please Download the information from the web-site www.unicreditgroup.eu (GOVERNANCE>BOARD OF DIRECTORS).		
2.6) Name of your Supervisory authority: Bank of Italy Name of your Financial Intelligence Unit (FIU): “Unità d’Informazione Finanziaria (UIF)” in the Bank of Italy		
2.7) Are you subject to external audit activities?	√	
If yes, please provide the name of yours external auditors: KPMG S.p.A		

LEGISLATION		
Question	Yes	No
3.1) Has your country of registration established laws designed to combat money laundering and terrorist financing? 3.1 bis) If yes, please list the name of your country’s relevant laws: Legislative Decree no 231/2007 (Italian AML Law)	√	
3.2) Is your bank subject to such laws?	√	
3.3) Is your bank compliant with your national AML and counter terrorist financing laws?	√	
3.4) Is your country a Financial Action Task Force (FATF) member?	√	
3.5) Does your country legislation require the application of the measures listed below?		
3.5.1) Do they require you to comply with customer due diligence measures when: a) establishing a business relationship? b) carrying out occasional transactions of significant amount?	√ √	
3.5.2) Do they require you to include in the customer due diligence the following: a) identifying the customer and verifying the customer's identity on the basis of documents, data or information obtained from a reliable and independent source? b) identifying the beneficial owner and verifying his identity? c) obtaining information on the purpose and intended nature of the business relationship? d) conducting ongoing monitoring of the business relationship?	√ √ √ √	
3.5.3) Do they prohibit you from keeping anonymous accounts or anonymous passbooks?	√	
3.5.4) Do they require you to have enhanced of due diligence measures for transactions or business relationships with “ <i>politically exposed persons</i> ” residing in a third country?	√	
3.5.5) Do they require you to have enhanced due diligence measures in the following: a) situations which by their nature can present a higher risk of money laundering or terrorist financing? b) when the customer has been not physically present for identification purposes? c) in respect of cross-frontier correspondent banking relationships and	√ √ √	

other similar relationships with respondent institutions from third countries?		
3.5.6) Do they require you to establish effective controls on a permanent basis to detect any activities suspected of money laundering and terrorist financing?	√	
3.5.7) Do they require you to keep customer identification account files, business correspondence and records for a specific period of time? 3.5.7 bis) If yes, for how long? Ten years	√	
3.5.8) Do they require you to have an established method of reporting suspicious activities and/or transactions to the appropriate authorities?	√	
3.5.9) Do they require you to have an established mandatory employee training program upon anti-money laundering and counter terrorist financing rules and procedures for all management and staff?	√	
3.6) Does your regulatory Supervisory authority undertake monitoring visits on a regular basis, to assess your money laundering and counter terrorist financing policies and procedures?	√	

POLICIES AND PROCEDURES		
Question	Yes	No
4.1) Does your AML and counter terrorist financing Compliance program require approval of your Board or a senior manager committee thereof?	√	
4.2) Does your bank comply with Financial Action Task Force (FATF) recommendations?	√	
4.3) Does your bank sign USA Patriot Act Certification?	√	
4.4) Has your bank established internal written policies and procedures to ensure compliance with the obligations under the existing national legislation on prevention of money laundering and counter terrorist financing? 4.4 bis) If yes, are such internal policies, related and consequent procedures applicable to your foreign branches and/or subsidiaries?	√	
4.5) Does your bank review those policies and procedures when necessary?	√	
4.6) Does your bank have a risk focused assessment of your customer base and transactions of your customers?	√	
4.7) Does your bank have a monitoring system for all payments to enable you to detect suspicious payments or transaction?	√	
4.8) Has your bank developed an internal function in order to monitor the adequacy and effectiveness of your anti-money laundering and counter terrorist financing policies and procedures on an ongoing basis? 4.8 bis) If yes, please provide details: The compliance function carries out ex ante controls whereas the Internal Audit function carries out ex post controls about the adequacy and effectiveness of our anti-money laundering and counter terrorist financing internal policies and procedures.	√	
4.9) Does your bank provide services to "shell banks"?		√
4.10 a) Does your Bank allow direct use of the so called "nostro accounts" with a Correspondent Bank by third parties (payable through accounts) to transact business on their own behalf? Some Italian Banks and, per specific agreement, a local Italian Bank –	√	

<p>in any case subject to the Italian AML Law – are authorized to use our accounts (for example drawing checks on nostro accounts held by UniCredit spa with Correspondent Banks</p> <p>4.10 b) Does your Bank allow direct use of the so called “loro accounts” opened with you by a Correspondent Bank by third parties (payable through accounts) to transact business on their own behalf?</p> <p>We allow some Correspondent Banks, holding a so called “loro account” with UniCredit spa, to enable some clients to issue checks on said account. In this case we ask for a formal agreement of the Correspondent Bank both to advise the issuing of a check via Swift MT110 and to guarantee adequate due diligence on third parties allowed to issue said checks and disclosure on the data of the third parties involved</p> <p>4.10 c) Does your Bank perform adequate due diligence on the third parties allowed to transact business on your accounts (so called “nostro accounts” with a Correspondent Bank) and guarantee disclosure on the data of the third party involved, if required?</p>	<p>√</p> <p>√</p>	
<p>4.11) Does your bank have a screening process to search your client database against government published lists of prohibited parties?</p> <p>4.11 bis) if yes, please provide sources: UE, UIF, ONU, OFAC</p>	<p>√</p>	
<p>4.12) Does your Bank employ agents to carry out some of the functions of the Bank?</p> <p>4.12 bis) If yes, does the Bank provide AML and counter terrorist financing training to relevant agents that includes identification and reporting of transactions that must be reported to government authorities, examples of different forms of money laundering and counter terrorist financing involving the Bank’s products and services and internal policies to prevent money laundering and counter terrorist financing?</p>	<p>√</p> <p>√</p>	
<p>4.13) Has your bank been prosecuted or fined for failure to comply with anti-money laundering laws in the last 5 years?</p>		<p>√</p>

Date: Milan, 01/05/2010

Signature: UNICREDIT SpA

Glossary. In this questionnaire the following references are used:

- **“politically exposed person”** means natural persons who are or have been entrusted with prominent public functions and immediate family members, or persons known to be close associates, of such persons.
- **“shell banks”** means a bank incorporated in a jurisdiction in which it has no physical presence and which is unaffiliated with a regulated financial group.