

# CUSTOMER IDENTIFICATION AND DUE DILIGENCE FORM

(Art. 15ff. Legislative Decree 231/2007)

## NOTICE PURSUANT TO ART. 13 LGS. DECREE 196/2003

### (Personal Data Protection Code)

[1] Dear Customer, the personal information you are requested to provide in this form is being gathered to comply with stipulations of the law [LD 231/2007] aiming to prevent use of the financial system to launder the proceeds of criminal activities and the financing of terrorism. Accordingly, the information requested must be provided and failure to do so may preclude the execution of the required transaction or, in case of relationships already existing, their closure, after the return of funds, instruments and other financial means on an account specified by you. The information provided will be processed for the aforementioned purposes, possibly by electronic means and strictly by authorized personnel so as to guarantee compliance with established standards of security and confidentiality. The information will not be disseminated, but may be disclosed to the competent supervisory bodies and authorities.

[2] Pursuant to articles 7 and 8 of LD 196/2003, access rights may be exercised by forwarding written request to Banca UBAE SpA – via Quintino Sella, 2 – 00187 Roma or by fax to the No. 06/42046495 or by e-mail to [privacy@bae.it](mailto:privacy@bae.it) to the attention of the Personal Data Processor. The Processor appointed by the Bank and domiciled for the functions at the bank is the pro-tempore Officer in task of Security and Privacy.

[1] This notice must precede the collection of the relevant information and may be given orally or in writing.

[2] Access rights may be exercised to check the accuracy of and/or to modify, correct or supplement the information provided; they may not be exercised in respect of anti-money laundering processing purposes [art. 8 LD 196/2003]

*To ensure the information provided below is complete, not least in relation to the criminal penalties foreseen by LD 231/ 2007, you are encouraged to read the directions on the last page of this form.*

### SECTION A \* Items marked by an asterisk refer to legal entities

**New Customer**                       **Account holder**                       **Occasional Customer**

#### Identification data of the account holder / operation

Name and Surname/Corporate name\* \_\_\_\_\_

Taxpayer code \_\_\_\_\_ Sex **M**                       **W**

VAT no. \_\_\_\_\_

Juridical Form \* \_\_\_\_\_

Place and date of birth/establishment\* \_\_\_\_\_ (\_\_\_\_) \_\_\_\_/\_\_\_\_/\_\_\_\_

State of Birth/Establishment\* \_\_\_\_\_

Citizenship 1 ( \_\_\_\_\_ )                      Citizenship 2 ( \_\_\_\_\_ )

State of the Head Office\* \_\_\_\_\_

Home address / Registered office\* \_\_\_\_\_

City \_\_\_\_\_ Prov. \_\_\_\_\_ Postcode \_\_\_\_\_ Country ( \_\_\_\_\_ )

Domicile (if other than home address) \_\_\_\_\_

City \_\_\_\_\_ Prov. \_\_\_\_\_ Postcode \_\_\_\_\_ Country ( \_\_\_\_\_ )

ID (type) \_\_\_\_\_ No. \_\_\_\_\_

Issued by \_\_\_\_\_ on \_\_dd / \_\_mm / \_\_yyyy\_\_

Politically exposed person (see definition at the end of this form):                      yes                       no

**Existence of a beneficial owner** YES                       NO

#### Identification data of the beneficial owner / account holder

Name and Surname \_\_\_\_\_

Taxpayer code \_\_\_\_\_ Sex **M**                       **W**

Place and date of birth \_\_\_\_\_ (\_\_\_\_) \_\_\_\_/\_\_\_\_/\_\_\_\_

State of Birth \_\_\_\_\_

Citizenship 1 ( \_\_\_\_\_ )                      Citizenship 2 ( \_\_\_\_\_ )

Home address \_\_\_\_\_

City \_\_\_\_\_ Prov. \_\_\_\_\_ Postcode \_\_\_\_\_ Country ( \_\_\_\_\_ )

Domicile (if other than home address) \_\_\_\_\_

City \_\_\_\_\_ Prov. \_\_\_\_\_ Postcode \_\_\_\_\_ Country ( \_\_\_\_\_ )

ID (type) \_\_\_\_\_ No. \_\_\_\_\_  
Issued by \_\_\_\_\_ on \_dd /\_mm /\_yyyy\_

Politically exposed person (see definition at the end of this form):    yes     no

**Identification data of the beneficial owner / account holder**

Name and Surname \_\_\_\_\_

Taxpayer code \_\_\_\_\_ Sex **M**  **W**

Place and date of birth \_\_\_\_\_ ( \_\_\_\_ ) \_\_\_\_ / \_\_\_\_ / \_\_\_\_

State \_\_\_\_\_

Citizenship 1 ( \_\_\_\_\_ )    Citizenship 2 ( \_\_\_\_\_ )

Home address \_\_\_\_\_

City \_\_\_\_\_ Prov. \_\_\_\_\_ Postcode \_\_\_\_\_ Country ( \_\_\_\_\_ )

Domicile (if other than home address) \_\_\_\_\_

City \_\_\_\_\_ Prov. \_\_\_\_\_ Postcode \_\_\_\_\_ Country ( \_\_\_\_\_ )

ID (type) \_\_\_\_\_ No. \_\_\_\_\_

Issued by \_\_\_\_\_ on \_dd /\_mm /\_yyyy\_

Politically exposed person (see definition at the end of this form):    yes     no

**Identification data of the beneficial owner / account holder**

Name and Surname \_\_\_\_\_

Taxpayer code \_\_\_\_\_ Sex **M**  **W**

Place and date of birth \_\_\_\_\_ ( \_\_\_\_ ) \_\_\_\_ / \_\_\_\_ / \_\_\_\_

State \_\_\_\_\_

Citizenship 1 ( \_\_\_\_\_ )    Citizenship 2 ( \_\_\_\_\_ )

Home address \_\_\_\_\_

City \_\_\_\_\_ Prov. \_\_\_\_\_ Postcode \_\_\_\_\_ Country ( \_\_\_\_\_ )

Domicile (if other than home address) \_\_\_\_\_

City \_\_\_\_\_ Prov. \_\_\_\_\_ Postcode \_\_\_\_\_ Country ( \_\_\_\_\_ )

ID (type) \_\_\_\_\_ No. \_\_\_\_\_

Issued by \_\_\_\_\_ on \_dd /\_mm /\_yyyy\_

Politically exposed person (see definition at the end of this form):    yes     no

**Identification data of the beneficial owner / account holder**

Name and Surname \_\_\_\_\_

Taxpayer code \_\_\_\_\_ Sex **M**  **W**

Place and date of birth \_\_\_\_\_ ( \_\_\_\_ ) \_\_\_\_ / \_\_\_\_ / \_\_\_\_

State \_\_\_\_\_

Citizenship 1 ( \_\_\_\_\_ )    Citizenship 2 ( \_\_\_\_\_ )

Home address \_\_\_\_\_

City \_\_\_\_\_ Prov. \_\_\_\_\_ Postcode \_\_\_\_\_ Country ( \_\_\_\_\_ )

Domicile (if other than home address) \_\_\_\_\_

City \_\_\_\_\_ Prov. \_\_\_\_\_ Postcode \_\_\_\_\_ Country ( \_\_\_\_\_ )

ID (type) \_\_\_\_\_ No. \_\_\_\_\_

Issued by \_\_\_\_\_ on \_dd /\_mm /\_yyyy\_

Politically exposed person (see definition at the end of this form):    yes     no

**SECTION B** **Establishing of a continuous relationship** **Family/personal requirements** **Corporate/business/professional requirements**

Main purpose \_\_\_\_\_ (a)

Nature \_\_\_\_\_ (b)

Number (to be filled out by the bank) \_\_\_\_\_

Provenance of the money \_\_\_\_\_ intermediary \_\_\_\_\_

 **Occasional operation** \_\_\_\_\_ (c)Amount \_\_\_\_\_ Cash yes  no 

Large-denomination banknotes (Eur 500) \_\_\_\_\_ Large-denomination banknotes (Eur 200) \_\_\_\_\_

Foreign Currency \_\_\_\_\_

Province/State of the counterparty \_\_\_\_\_

Provenance of the money \_\_\_\_\_ intermediary \_\_\_\_\_

**Notes****Cross-border declaration** (please refer to the definition at the end of the present form) yes  no **SECTION C****Information on account/transaction/beneficial owner/proxy/authorized third party** **Legal entity/one man business:**

S.A.E. ( \_\_\_\_\_ ) R.A.E. ( \_\_\_\_\_ )

Code of activity T.A.E. (1) ( \_\_\_\_\_ ) DESCRIPTION ( \_\_\_\_\_ )

 **Individual:**Profession \_\_\_\_\_ (d)  
T.A.E. (1) ( \_\_\_\_\_ ) DESCRIPTION ( \_\_\_\_\_ )

Juridical form of the group belonging \_\_\_\_\_

Province /State of the prevailing economic activity ( \_\_\_\_\_ )

Customer's business country \_\_\_\_\_

**SECTION D****Executor (if any) acting on behalf of the beneficial owner**

Surname and Name \_\_\_\_\_

Taxpayer Code \_\_\_\_\_ Sex **M**  **W** 

Place and Date of birth \_\_\_\_\_ ( \_\_\_\_\_ ) \_\_\_\_/\_\_\_\_/\_\_\_\_

Country of birth \_\_\_\_\_

Citizenship 1 \_\_\_\_\_ Citizenship 2 \_\_\_\_\_

Home address \_\_\_\_\_

City \_\_\_\_\_ Prov. \_\_\_\_\_ Postcode \_\_\_\_\_ Country ( \_\_\_\_\_ )

Domicile (if other than home address) \_\_\_\_\_

City \_\_\_\_\_ Prov. \_\_\_\_\_ Postcode \_\_\_\_\_ Country ( \_\_\_\_\_ )

ID (type) \_\_\_\_\_ No. \_\_\_\_\_  
Issued by \_\_\_\_\_ on \_\_\_\_/\_\_\_\_/\_\_\_\_  
Type of authorization:  Legal Representative  Tutor  Proxy  On behalf of third parties/other  
Politically exposed person (see definition at the end of the present form): yes  no

**SECTION E**

**Executor (if any) acting on behalf of beneficial owner**

**Individual:**  
profession \_\_\_\_\_ T.A.E. (1) ( \_\_\_\_\_ ) DESCRIPTION ( \_\_\_\_\_ (d) \_\_\_\_\_ )

Juridical form of the group belonging \_\_\_\_\_

Province /State of the prevailing economic activity ( \_\_\_\_\_ )

Customer's business countries \_\_\_\_\_

I hereby declare, in the awareness that false representations herein are subject to criminal prosecution pursuant to art. 55 of LD 231/2007, that this form, in compliance with the provisions of art. 21 of the said LD 231/2007, contains all required, up to date information to the best of my knowledge, including with regard to the beneficial owner of the account/transaction, and that such information is true and accurate. I undertake, furthermore, to notify you of any future change that may occur in relation thereto.

Date dd / mm / yyyy Signed by principal / executor \_\_\_\_\_

**➤ Subject conducting the identification procedure**

I hereby \_\_\_\_\_, in my position as \_\_\_\_\_, declare, under my own responsibility, that I have identified the account holder/executor upon presentation of his/her identity document and that the signature has been affixed in person and in my presence.

**Date** dd / mm / yyyy **Signature** \_\_\_\_\_

(1) T.A.E. (Type of Economic Activity) is a table created to give details on the following S.A.E. (Sector of Economic Activity) codes: 600 Consumer families; 773 Consumer families of EMU (Economic Monetary Union)-member EU countries; 774 Consumer families of non-EMU EU countries; 775 Consumer families of non-EU countries. The aforesaid table is also used to specify the following S.A.E. codes that have no related R.A.E. (Branch of Economic Activity): 757 Non-financial companies of EMU-member EU countries; 758 Non-financial companies of non-EMI EU countries; 759 Non-financial companies of non-EU countries; 768 Small businesses of EMU-member EU countries; 769 Small businesses of non-EMU EU countries; 772 Small businesses of non-EU countries

# Sanctions and Definitions under the terms of LD 231/21.11.2007

## Customer's obligations

### Art. 21, LD 231/2007

1. Customers shall provide, on their own responsibility, all the necessary and updated information for the natural and legal persons subject to this decree to comply with the customer due diligence requirements. For the identification of beneficial owners, customers shall provide in writing, on their own responsibility, all the necessary and updated information in their possession.

## Obligation to refrain

### Art. 23, para 1, 1 bis, 2 and 3 of L. D. 231/2007

1. When institutions or persons subject to this decree are unable to comply with the customer due diligence requirements laid down by Articles 18(1)(a), 18(1)(b) and 18(1)(c), they may not establish the continuous relationship or carry out transactions or professional services or must terminate the continuous relationship or professional service and must assess whether to make a report to the FIU pursuant to Title II, Chapter III.

1-bis. If it is not possible to respect the requirements for due diligence for the relationships already existing, operations or professional services in course of realization, the bodies or persons subject to the present decree will return to the customer the funds, the instruments and the other financial means, by liquidating the amount through transfer on a bank account indicated by the customer. The fund transfer will be accompanied by a message to the banking counterparty reporting that sums are returned to the customer due to the impossibility to respect the due diligence obligations established in art. 18, para. 1).

2. For the cases falling under the para. 1 and 1-bis, before reporting the suspect operation to FIU, pursuant to art. 41 and in order to allow the exercise of power of suspension as per art. 6 para. 7 letter c), the bodies and the persons subject to the present decree will refrain to execute the operations suspected to have a relation with the money laundering or terrorism financing.

3. Where refraining is impossible because there is a legal obligation to receive the act or because execution of the transaction, by its nature, cannot be deferred or because refraining could impede investigations, the entities and persons subject to this decree shall report the suspect operation pursuant to art. 41.

## Criminal sanctions

### Art. 55 para 2, 3 and 6 of LD 231/20072.

2. Unless the fact constitutes a more serious crime, the executor of the transaction who fails to give the identifying particulars of the person for whom the transactions is executed or who provides false particulars shall be punished with from 6 to 12 months' imprisonment and a fine of from €500 to €5,000.

3. Unless the act constitutes a more serious crime, the executor of the transaction who fails to provide information on the purpose and the nature of the continuous relationship or the professional service or who provides false information in this regard shall be punished with from 6 months' to 3 years' imprisonment and a fine of from €5,000 to €50,000.

6. If the customer identification and recording requirements are fulfilled using fraudulent means such as to obstruct the identification of the person who effected the transaction, the sanction referred to in paragraph 2 shall be doubled.

## Beneficial owner

### Art.2 Technical Annex to the L.D. 231/07

(Ref. Art. 1, para. 2, lett. U L.D. 231/2007)

1. Beneficial owner shall mean:

a) in case of **companies**:

1) the natural person or persons who ultimately own or control a legal entity through direct or indirect ownership or control over a sufficient percentage of the capital stock or voting rights in that legal entity, including through bearer shares, provided that it is not a company listed on a regulated market that is subject to disclosure requirements consistent with Community legislation or subject to equivalent international standards; a percentage of 25% plus one share shall be deemed sufficient to meet this criterion;

2) the natural person or persons who otherwise exercise control over the management of a legal entity.

b) in the case of **legal entities, such as foundations, and legal arrangements, such as trusts**, which administer and distribute funds:

1) if the future beneficiaries have already been determined, the natural person or persons who are beneficiary of 25% or more of the property of a legal entity;

2) if the individuals that benefit from the legal entity have not been determined yet, the class of persons in whose main interest the legal entity is set up or operates; the natural person/s who control 25% or more of a legal entity's capital;

3) the natural person or persons who exercise control over 25 per cent or more of the property of a legal entity.

2.or: the natural person or persons on behalf of whom the customer carries out an operation (Ref: Banca d'Italia's Provision 3/4/2013).

## Politically exposed persons

### Art. 1 Technical Annex to the L.D. 231/2007 (Ref. art. 1, para. 2, lett. L.D. 231/2007)

1. Natural persons who are or have been entrusted with prominent public functions shall mean:

a) heads of State, heads of government, ministers and undersecretaries;

b) members of parliament;

c) members of supreme courts, constitutional courts and other high-level judicial bodies, whose rulings are not generally subject to further appeal, barring exceptional circumstances;

d) members of state audit offices and of the boards of directors of central banks;

e) ambassadors, chargés d'affaires and high-ranking officials in the armed forces;

f) members of the administrative, management or supervisory bodies of state-owned enterprises.

Middle and lower-ranking officials are not included in any of the categories specified above. The categories from subparagraphs a) through e) include, where applicable, positions at European and international level.

2. Close relatives shall mean:

a) spouses;

b) children and their spouses;

c) those who in the last five-year period have lived with the persons referred to in the previous subparagraphs;

d) parents.

3. For the purposes of identifying the persons with whom the natural persons listed in paragraph 1 above are known to have close relationships, reference shall be made to:

a) any natural person who is known to have joint beneficial ownership of legal entities or any other close business relationship with a person referred to in paragraph 1;

b) any natural person who is the sole beneficial owner of legal entities or legal persons known to have been *de facto* established for the benefit of a person referred to in paragraph 1.

4. Without prejudice to the application of enhanced customer due diligence measures, and adopting a risk-based approach, when a person has ceased to hold prominent public functions for at least one year, the persons subject to this decree shall not be obliged to consider that person as politically exposed.

## **Cross-border declaration**

### **Art. 3 L. D. 195/2008 - Declaration requirement**

1. Anyone entering or leaving the national territory and carrying cash of an amount equal to or higher than EUR 10,000 shall declare that sum to the Inland Customs . The obligation to disclose is not satisfied if the information provided is incorrect or incomplete.

3 . Paragraph 1 shall also apply to all transfers of cash to and from foreign countries, carried out by registered post or equivalent. The statement, prepared in accordance with the model attached to this decree , and ' delivered to Poste Italiane Spa or the providers of postal services within the meaning of Legislative Decree 22 July 1999, No. 261, at the time of delivery or within 48 hours from the receipt. In the computation of time periods bank holidays are not taken into account.

5 . The provisions of this Decree shall not apply to transfers of money orders or bills of exchange, checks, postal or bank drafts, drawn on or issued by a bank or Poste Italiane Spa which bear the names of the beneficiary and the non-transferability clause. The application of Article 49 of L.D. 21 November 2007, No. 231, and subsequent amendments is barred.

Article 1, para. 1, letter c) D.L. 195/2008 - Definitions

cash:

1 )banknotes and coins being legal tender ;

2 )the bearer negotiable instruments including monetary instruments in bearer form such as travelers' checks ; negotiable instruments , including checks, promissory notes and money orders issued in bearer form, endorsed without restriction, made out to a fictitious payee, or otherwise in such form that title thereto passes upon delivery ; the incomplete instruments , including checks, promissory notes and money orders , signed but without the name of the beneficiary

## **Simplified obligations of customer due diligence**

### **Art. 25 of L.D. 231/2007**

1. Persons subject to this decree shall not be subject to the requirements provided for in Section I if the customer is, exception made for those of letter c),:

a) one of the persons indicated in Articles 11(1), 11(2)(b) and 11(2)(c);

b) a EU credit or financial institution covered by the Directive;

c) a credit or financial institution located in a non-EU country that establishes equivalent requirements to those laid down in the Directive and provides for control on compliance with such requirements;

c-bis) a company or other listed body whose financial instruments are admitted to the negotiation on a ruled market pursuant to EU Regulation 2004/39 in one of the Member States, or a company another listed foreign State body subject to communication requirements complying with the communitarian provisions.

2. The Minister for the Economy and Finance, after consulting the Financial Security Committee, shall issue a decree identifying the non-EU countries whose regime is deemed equivalent.

3. Identification and verification shall not be required if the customer is an office of general government or an institution or organization performing public functions in accordance with the treaty on the European Union, the treaties on the European Communities or secondary Community law.

4. In the cases referred to in paragraphs 1 and 3, institutions and persons subject to this decree shall nonetheless gather sufficient information to establish whether the customer can benefit from one of the exemptions provided for in those paragraphs.

5. The simplified customer due diligence requirements shall not apply where there is a reason to believe that the identification made pursuant to this article is not reliable or where it does not permit the necessary information to be acquired.

1. For the purposes of this decree, financial intermediaries shall mean:

- a) banks;
- b) Poste Italiane S.p.A.;
- c) electronic money institutions;
- c-bis) Italian investment firms;
- d) brokerage firms (SIM)
- e) Italian asset management companies (SGR);
- f) SICAVs Investment companies with variable Capital);
- g) insurance companies operating in Italy in the branches referred to in Article 2(1) of the Private Insurance Code;
- h) stockbrokers;
- i) companies that provide tax collection services;
- l) repealed;
- m) financial intermediaries enrolled in the special register referred to in Article 106 of the Consolidated Banking Law;
- n) the Italian branches of persons referred to in the preceding subparagraphs having their registered office in a foreign country and the Italian branches of harmonized asset management companies and investment firms;
- o) Cassa depositi e prestiti S.p.A.

2. Financial intermediaries shall also mean:

- a) trust companies referred to in Law No. 1966 of 23 November 1939 exception made for those mentioned in art. 199 of the LD 24/2/1998 No. 58;
- b) the subjects ruled by art. 111 and 112 of the CBL;
- c) the subjects carrying out the activity of brokerage consisting in spot negotiations of payment means in foreign currency;
- d) repealed;

3. For the purposes of this decree, other persons engaged in financial activities shall mean:

- a) financial salesmen entered in the register referred to in Article 31 of the Consolidated Law on Finance;
- b) insurance intermediaries referred to in Articles 109(2)(a) and 109(2)(b) of the Private Insurance Code that operate in the branches referred to in paragraph 1(g);
- c) brokers enrolled in the register referred to in Article 128 para 2 of the CBL;
- d) financial agents entered in the list referred to in Article 128 quarter, para 2 of the CBL and the agents included in art. 128 quarter, para 7 of the CBL;

4. The persons referred to in paragraphs 1 and 2 shall fulfill the obligations concerning adequate customer verification and retention, including by way of measures and procedures equivalent to those established by this decree, without prejudice to Article 5 of the Personal Data Protection Code. If the non-EU country's legislation does not permit the application of equivalent measures, the subjects referred to in paragraphs 1 and 2 must report to the supervisory authorities, in Italy and adopt additional measures in order to effectively face the money laundering and financing terrorism risk.



## Legend

### a) Main purpose of the permanent relationship

Code	Description
09	SAVINGS
10	FINANCING
11	INVESTMENT
12	MANAGEMENT OF FAMILY ORDINARY NEEDS
13	VARIOUS NEEDS
14	MANAGEMENT ON COLLECTIONS AND CORPORATE PAYMENTS – ACTIVE A/Cs
15	FACILITIES GRANTED
16	DISINVESTMENTS OF COMMERCIAL CREDITS - ITALY
17	MANAGEMENT OF CORPORATE TREASURY
18	MANAGEMENT OF SUPPLIERS
19	DISINVESTMENT OF COMMERCIAL CREDITS - ABROAD
20	SETTLEMENT OF TRANSACTIONS FROM/TO ABROAD
21	MANAGEMENT OF SALARIES TO STAFF
22	INVESTMENT ACTIVITY

### b) Nature of the permanent relationship

Code	Description
01	CURRENT ACCOUNT
02	TIME SAVINGS DEPOSIT
03	CREDIT CARDS
04	SECURITY DEPOSITS
05	SAFE BOXES/CLOSED DEPOSITS
06	FINANCING
07	OTHERS
08	SERVICES ON INVESTMENTS
09	PREPAID CARDS
10	TRUSTED MANAGEMENT OF GOODS
11	PARTICIPATION ASSUMPTION
12	GUARANTEE ISSUANCE AND CONTINGENT UNDERTAKINGS
13	INSURANCE POLICIES
14	PLEDGE POLICIES

### c) Nature of the occasional operation

Code	Description
01	PAYMENT ORDER - ITALY
02	PAYMENT ORDER - ABROAD
03	TAX PAYMENT F23/F24
04	MAV/RAV FORMS
05	OTHER POSTAL/BANK FORMS (HOME CONSUMPTIONS/IMU..)
06	<a href="#">Ri.BA</a> /PAPER EFFECTS (DRAFTS/PROMISSORY NOTES)
07	CHANGE OF CIRCULAR CHEQUES MONEY ORDERS AND SIMILAR
08	MONEY REMITTANCES
09	PURCHASE/SALE OF FOREIGN CURRENCY
10	PURCHASE / COLLECTION OF TRAVELLERS CHEQUES
11	DEPOSIT/WITHDRAWAL OF BEARER SECURITIES
12	DEPOSIT/WITHDRAWAL ON PRE-PAID CARDS
13	COLLECTION OF WINS (Lotto, Gratta e Vinci, Prizes)
14	OTHER PAYMENTS

### d) Profession

Code	Description
01	ENTREPRENEUR
02	AUTONOMOUS WORKER
03	PROFESSIONAL
04	DEPENDANT WORKER
05	TOP MANAGEMENT
06	RETIRED
07	UNEMPLOYED