### **CUSTOMER IDENTIFICATION AND DUE DILIGENCE FORM**

(Art. 17 ff. Legislative Decree 231/2007 subsequently amended and supplemented (s.a.s.)

### NOTICE PURSUANT TO ART. 13 REG. (EU) N. 679/2016

European regulation regarding to the protection of individuals with regard to the processing of personal data, as well as to the free movement of such data "Reg (Eu) no. 679/2016

[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(s.a.s.)] aiming to prevent use of the financial system to launder the proceeds of criminal activities and the financing of terrorism. The provision of data is therefore mandatory.

The refusal of supply the requested information may lead to, pursuant to the article 42 of anti-money laundering, 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 13 and 14 of Reg. (EU) n. 679/2016, access rights may be exercised by forwarding written request to Banca UBAE SpA – via Quintino Sella, 2 – 00187 Roma or by e-mail to <a href="mailto:privacy@ubae.it">privacy@ubae.it</a>.

Please contact UBAE's Data Protection Officer at the above mentioned email address or at the following: <a href="mailto:dpo@ubae.it">dpo@ubae.it</a>

- [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
Identification data of the account holder/operation
Name and Surname/Corporate Name
Taxpayer Code Sex M F
VAT number*
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 byon//
Politically exposed person (see definition at the end of this form ) yes $\square$ no $\square$
The subject holds other public offices yes (please see the definition at the end of this form)
Identification data of the beneficial owner / account holder Relation between account holder /beneficial owner
(p)
Name and Surname
Taxpayer codeSex M F
Place and date of birth()/
State of birth
Citizenship 1 Citizenship 2
Home address
City ProvPostcode
Country
Domicile (if other than home address)
City         Prov Postcode Country
ID typeNo
Issued by on//
Politically exposed person (see definition at the end of this form ) yes $lacksquare$ no $lacksquare$
The subject holds other public offices yes one of this form)

Identification data of the ben Relation between account ho						
(p)						
Name and Surname						
Taxpayer code				Sex M	F 🔲	
Place and date of birth					_//_	
State of birth						
Citizenship 1		Citizenship	2			
Home address						
City	Prov	Postcode		Country		
Domicile (if other than home ac	dress)					
City	Prov	Postcode		Country		
ID type		No				
Issued by			on_	/	/	
Politically exposed person (see	definition at the end (	of this form )	yes 🔲	no 🔲		
The subject holds other public of please see the definition at the			yes 🔲	no 🔲		
(please see the definition at the	end of this form)					
Identification data of the be Relation between account h	•		r			
(p)						
Name and Surname						
Taxpayer code				Sex M	F 🔲	
Place and date of birth			(	)	_//_	
State of birth						
Citizenship 1		Citizenship	2			
Home address						
City		Prov				Postcode
		Country				
Domicile (if other than home ad	dress)					
City	Prov	Postcode		Country		
ID type		No				
Issued by			on_			
Politically exposed person (see The subject holds other public of (please see the definition at the	offices	of this form )	yes L	no no		

Identification data of the beneficial owner / account holder
Relation between account holder / beneficial owner(p)
Name and Surname
Taxpayer code Sex M F
Place and date of birth ( )/
State of birth
Citizenship 1 Citizenship 2
Home address
CityProv Postcode Country
Domicile (if other than home address)
City Prov Postcode Country
ID type No
Issued by on//
Politically exposed person (see definition at the end of this form ) yes no
The subject holds other public offices yes  no  place yes  no  place yes  no  place yes  place yes
SECTION B  Establishing of a continuous relationship Due diligence renewal  Origin/destination of funds (e)  Notes on origin/ destination of funds
Family/personal requirements Corporate/Business/professional requirements
Main purpose (a)
Nature (b)
Number (to be filled out by the bank )
Occasional operation (c)
Origin/destination of funds (e)
Notes on origin/ destination of funds
Amount cash yes no
Large-denomination banknotes (Eur 500 ) Large-denomination banknotes ( 200 euro)
Foreign currency
Province /State of counterparty
Notes
Cross border declaration ( please refer to the definition at the end of the present form )

Information on account /transaction/be	eneficial owner/Authorized third party
Legal entity	
SAE RAE/ATECO	
Code of activity TAE <b>(1)</b>	Description
Province/State of the prevailing economic ac	ctivity
Customer's business country	
Individual /One man company	
Individual /One man company Profession (d)	
• •	
Juridical form of the group belonging	
Province/State of the prevailing economic act	tivity
Customer's business country	
SECTION D	
Executor (if any) acting on behalf of th	e beneficial owner
Surname and name	
Taxpayer code	Sex M F
Place and date of birth	()//
Country of birth	
Citizenship 1	Citizenship 2
Home address	

 City \_\_\_\_\_\_\_Prov. \_\_\_\_\_Postcode \_\_\_\_\_\_Country \_\_\_\_\_

 City \_\_\_\_\_\_ Prov.\_\_\_\_ Postcode \_\_\_\_\_ Country\_\_\_\_\_

 ID type \_\_\_\_\_\_ No. \_\_\_\_\_

\_\_\_\_\_on\_\_\_\_/ \_\_\_\_\_/ \_\_\_\_\_\_

on behalf of third parties/other

Proxy

yes [

Domicile (if other than home address)

(please see the definition at the end of this form)

The subject holds other public offices

Type of authorization Legal representative Tutor

Politically exposed person (see definition at the end of the present form )

Issued by \_\_\_

# SECTION E

Executor (if any) acting on behalf of beneficial owner
Individual:
Profession
T.A.E. <b>(1)</b> Description
Juridical form of the group belonging
Province/State of the prevailing economic activity
Customer's business countries
Income / Capital data (legal entities)
Yearly Turnover (f)
Shareholder's Equity in Eur/000
Capital in euro/000
Profit(i)
Number of employees(I)
Year of reference
Income / Capital data (Individuals)  Yearly Income (m)
Capital (n)
Year of reference
I hereby declare, in the awareness that false representations herein are subject to criminal prosecution pursuant to art. 55 of LD 231/2007 (s.a.s.), that this form, in compliance with the provisions of art. 21 of the said LD 231/2007 (s.a.s.), 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 there to.
Date/
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 / 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

Notice on Obligations pursuant to Legislative Decree n ° 231 of 21 November 2007 and s.m.i.

#### **Customer's obligations**

#### Art. 22 LD 231/2007 (s.a.s.)

- 1. Clients provide, under their responsibility, all the necessary and up-to-date information to enable the parties involved by this Decree to comply with the obligations of proper verification.
- 2. For the purposes of this Decree, companies with legal personality and private legal persons shall obtain and retain for a period not less than five years adequate, accurate and up-to-date information on their actual ownership and shall provide them with the obliged persons, on the occasion of the instrumental fulfillment to the adequate verification of the customers.
- 3. The information referred to in paragraph 2, relating to legal entities obliged to the registration in the Registry of Companies referred to in Art. 2188 of the Italian Civil Code, shall be acquired by the directors on the basis of the results of the writings accounts and financial statements, the book of shareholders, communications relating to the ownership or control of the entity, to which the enterprise is held in accordance with the provisions in force, as well as the communications received from the shareholders and any other information made available to them. If there is any doubt about the actual ownership, the information is acquired by the directors following an express request to the shareholders for which it is necessary to deepen the entity in the interest of the body. The unjustified inertia or justification of the member in providing the administrators with the information they deem necessary for the identification of the actual holder or the indication of clearly misleading information render the voting rights inapplicable and imply the right to vote in accordance with Art 2377 of the Italian Civil Code, of the deliberations eventually taken with its decisive vote. The provisions of Articles 120 and 122 TUF, 74 and 77, CAP 2341-ter of the Italian Civil Code are applicable, as they are compatible.
- 4. The information referred to in paragraph 2, relating to private legal persons, required to be entered in the Register of Private Legal Persons under the decree of the President of the Republic of 10 February 2000, No 361 and subsequent amendments shall be acquired by the founder in life or by the subjects assigned to the representation and administration of the institution, on the basis of the provisions of the articles of association, the constitution, the accounting records and any other communication or given to them.information in their possession.
- 5. Trust trustees expressly ruled pursuant to Law No 364 of 16 October 1989 shall obtain and hold adequate, accurate and up-to-date information on the effective ownership of the trust, as such, relating to the identity of the founder, trustee or trustees, guardians or other persons on behalf of the trustee, if any, of the beneficiaries or other physical persons exercising control over the trust and any other natural person who ultimately exercises control over the goods conferred on trust through direct or indirect property or through other means. Trust trustees shall retain such information for a period of not less than five years after the termination of their trustee status and make them readily accessible to the authorities referred to in Art 21 (2) (a) and (b). The same fiduciaries who, in this capacity, establish a continuous or professional relationship or perform an occasional performance declare their status to the obliqed persons.

### Obligation to refrain

#### Art. 42, para 1, 2 and 4 of L. D. 231/2007 (s.a.s.)

- 1. Obliged persons who are in the inability to carry out the proper verification of their customers, in accordance with the provisions of Article 19 (1) (a), (b) and (c), shall refrain from insuring, execute or continue the relationship, professional performance and operations and assess whether to make a suspicious transaction report to UIF in accordance with Article 35.
- 2. Obliged persons shall refrain from entering into a continuous relationship, executing transactions or professional services and terminating the ongoing relationship of which they are, directly or indirectly, part of trustee companies, trusts, anonymous companies or controlled by bearer shares having head offices in High Risk Third Countries. These measures also apply to other legal entities otherwise designated, having their seat in the above mentioned countries, of which it is not possible to identify the actual holder or verify their identity.
- 4. It is done in any case save the application of art. 35, paragraph 2, in cases where the transaction is to be executed as there is a legal obligation to receive the act

#### **Criminal sanctions**

### Art. 55 para 3 of LD 231/2007 (s.a.s.)

3. Unless the act represents a most serious offense, anyone who is obliged under this Decree to supply the necessary data and information for the purpose of proper customer verification, provides false or untruthful information, is punished with the imprisonment for six months to three years and with fine from 10,000 euros to 30,000 euros.

#### **Beneficial** owner

# **Art.1 para. 2 – letter pp L.D.** 231/2007 (s.a.s.)

1. Beneficial owner shall mean:

The natural person/s, other than the customer, in the interest of whom the on-going relationship is established, or the professional service is rendered, the operation is executed.

#### Art. 20 Lgs. 231/2007 (s.a.s.)

- 1. The beneficial owner of a customer other than a natural person coincides with the natural person/s to whom, ultimately, the direct or indirect property of the or its control Is attributable.
- 2. If the client is a capital company:
- (a) It is a direct ownership indication that a holding holds more than 25 percent of the customer's capital, held by a natural person
- b) Indirect ownership indication is the ownership of a holding exceeding 25 per cent of the capital held through subsidiaries, trust companies or intermediaries.
- 3. In the case where the examination of a proprietor does not permit a unique identification of the natural person or natural persons to which the direct or indirect property of the body is attributable, the actual holder coincides with the natural person or persons physics to which, ultimately, it is attributable to its control in force of the:
- (a) control of the majority of votes exercisable at ordinary shareholders' meetings;
- (b) sufficient votes to exercise dominant influence at ordinary shareholders' meetings;
- (c) the existence of particular contractual constraints enabling them to exercise dominant influence.
- 4. If the application of the criteria set out in the preceding paragraphs does not permit uniquely to identify one or more beneficial owners, the beneficial owner coincides with the natural person or natural persons holding the power of administration or management of the company.
- 5. In the event that the client is a private legal person, as provided for in the Decree of the President of the Republic of 10 February 2000, No. 361, are cumulatively identified as beneficial owners:
- (a) Founders, if they are alive;
- (b) Beneficiaries, when identified or easily identifiable;
- (c) Holders of management and administration functions;
- 6. Obliged persons shall keep track of the verifications carried out for the purpose of identifying the beneficial owner.

### **Politically exposed persons**

#### Art. 1 Para2 - letter dd) L.D. 231/2007 (s.a.s.)

Politically exposed people: natural persons who occupy or have ceased occupying public office for less than a year, as well as their family members and those who with these subjects have known close ties, as follows:

1. Natural persons are those who occupy or have occupied important public office those who are or have held the office of:

- 1.1. President of the Republic, Prime Minister, Minister, Deputy Minister and Undersecretary, Region President, Regional Councilor, Mayor of provincial capital or metropolitan city, Mayor of municipality with a population of not less than 15,000 inhabitants and similar positions in foreign states;
- 1.2. Member of Parliament, Senator, European Parliament, Regional Councilor and similar positions in foreign states;
- 1.3. a member of the central governing bodies of political parties;
- 1.4. judge of the Constitutional Court, magistrate of the Court of Cassation or the Court of Auditors, State Councilor and other members of the Administrative Council for the Sicilian Region and similar positions in foreign states;
- 1.5. member of the governing bodies of central banks and independent authorities;
- 1.6. ambassador, businessman or equivalent officer in foreign states, officer of the aptitude of the armed forces or similar positions in foreign states;
- 1.7. a member of the administrative, management or control bodies of the subsidiaries, whether indirectly, of the Italian State or of a foreign state, or in a prevailing or totalitarian extent by the Regions, provincial capitals and metropolitan cities and municipalities with a total population not less than 15,000 inhabitants;
- 1.8. general manager of ASL and hospital company, university hospital company and other national service bodies;
- 1.9. director, deputy director and member of the management body or entity performing equivalent functions in international organizations;
- 2. Family members of politically exposed persons are: parents, spouses or persons linked to civil union or factual residence or institutions comparable to politically exposed persons, children and their spouses, as well as persons related to children in union or coexistence of fact or similar institutes;
- 3. subjects with which politically exposed persons have well-known close ties are:
- 3.1. natural persons linked to politically exposed persons by virtue of the effective joint ownership of legal entities or other close business relationship;
- 3.2. natural persons who only formally hold the total control of an entity that is known to be actually established in the interest and benefit of a politically exposed person;

#### Cross-border declaration

#### Art. 3 L. D. 195/2008 - Declaration requirements

- 1. Anyone entering or leaving the national territory and carrying cash of an amount equal to or higher than EUR 10,000 must declare that sum to the Customs Agency. 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 travellers' 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

#### 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 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	RIBA/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		
13	Collection of wings		
14	Other payments		

# d) Profession

Code	Description
01	Entrepreneur
02	Autonomous worker
03	Professional
04	Dependant worker
05	Top management
06	Retired
07	Unemployed

# e) Description/Origin of funds

Code	Description	Subject type
1	Winning	I
2	Legacy	I
3	Sale of real estate	(**)
4	Sale of property	(**)
5	From another account	(**)
6	Income from sub. job	I
7	Income from ind. job	I
8	Savings	I
9	Collection from customers	LE
10	Sale of company acquisition	LE
11	Securities transaction	(**)

(I=Individual, LE =Legal Entity, \*\*= both types)

### **Yearly Turnover**

Values
Crisis
Lower than Eur 2 mn.
Between Eur 2 mn and Eur 10 mn
Between Eur 10 mn and Eur 50 mn
Higher than 50 mn
Not declared

### i) Economic result

Ĺegend	
Profit	
Loss	
Not declared	

# I) number of Employees

Values	
From 1 to 9	
From 10 to 49	
From 50 to 249	
>= 250	
Not declared	

# m) Yearly Income

Values
From eur 0 to eur 15.000,00
From eur 15.001,00 to eur 28.000,00
From eur 28.000,01 to eur 55.000,00
From eur 55.000,01 to eur 75.000,00
Over eur 75.000,00
Not declared

# n) shareholder's equity

Values	
Lower than Eur 25.000,00	
Between Eur 25.001,00 and eur 50.000,00	
Between Eur 50.001,00 and eur 100.000,00	
Between Eur 100.001,00 and eur 250.000	
Between Eur 250.001,00 and eur 500.000,00	
More than Eur 500.000,00	
Not declared	

# p) relation between beneficial owner /account holder

Code	Relation	Norm reference
1	Subject with direct / indirect possession / control of a percentage higher than 25 % of	Art.20 par 1 – 2
	the capital	
2	Subject with major influence (by virtue of majority / sufficient votes or corporate	Art. 20 par. 3
	agreement / particular contractual ties )	
3	With administration or managements power	Art. 20 par 4
4	Founder of private entity ex DPR No. 361/2000	
5	Beneficiary of private entity ex DPR No. 361/2000	Art. 20 par 5
6	With administration or management powers of private entity ex DPR No. 361/2000	
7	Settlor / Trustor	
8	Trustee	
9	Truster	
10	Guardian	Art. 22 par 5
11	Beneficiary of the trust's asset	
12	Subject controlling -also materially - assets transferred in the trust	