

# ANTI-MONEY LAUNDERING ANALYTIC QUESTIONNAIRE FOR CORRESPONDENT BANKS

In accordance with our AML Policy, which derives from the requirements stipulated in the 4th EU Anti-Money Laundering Directive and Italian Law Decree No. 231/2007, we need to periodically verify the identity of our counterparties who have correspondent arrangement (SWIFT RMA) and/or all your correspondent account(s) with us through this AML/KYC questionnaire.

Note: FI means "Financial Institution"

## SECTION 1 GENERAL INFORMATION

1	Full legal name	BANCA UBAE SPA
2	Registered Address (P. O. Box is not sufficient)	Via Quintino Sella 2, 00187 Rome Italy
3	Web address	<a href="http://www.bancaubae.it">www.bancaubae.it</a>
4	Swift address	UBAI IT RR
5	Country of incorporation	Italy
6	Banking license No.	No.4729
7	Registration Number	RM 379257
8	Number of Branches (Domestic/Foreign)	1 domestic Branch
9	Principal place of business	Italy
10	Main banking activities	Corporate trade banking; oil& energy financing; forex/treasury management/capital markets operations; search of selection of business counterparties (bank or large corporates) in connection with trade activities
11	Number of Employees	170
12	Name of External Auditors	B.D.O. Italia SPA
13	Name of your Regulatory Body	Bank of Italy
12	Has your FI merged with another firm? Has your company's name changed during the past 5 years? If both yes, please provide details	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>

13 Is your FI a branch or subsidiary of a parent financial institution? Yes  No

If your answer to the question above is yes, please specify the relationship type and provide the following parent financial institution' details:  Branch  Subsidiary

- 13a
- Name of parent company:
  - Registered address:
  - Physical address:
  - Swift/Telex:
  - Website:
  - Banking license:
  - Principal local regulator and AML/CFT competent authority (if not the same):
  - Is parent company listed on any stock exchange?

## SECTION 2 OWNERSHIP STRUCTURE AND MANAGEMENT INFORMATION

1 Are shares publicly held or privately owned? Privately owned

2 Is it listed on any stock exchange? Yes  No

		Full names and % of ownership share:		
		Name	Number of shares	%
2.a	If your answer to the question above is yes, please indicate the name of stock exchange.  If it is no, please list full names of shareholders who directly or indirectly own, control or have any percentage of the shares or voting power of your Institution.	<b>Libyan Foreign Bank, Tripoli</b>	<b>1.902.870</b>	<b>80,15</b>
		<b>Unicredit Spa, Rome</b>	<b>156.825</b>	<b>6,60</b>
		<b>Eni SpA</b>	<b>78.395</b>	<b>3,30</b>
		<b>Banque Centrale Populaire, Casablanca</b>	<b>67.684</b>	<b>2,85</b>
		<b>Banque Marocaine du Commerce Exterieur, Casablanca</b>	<b>63.032</b>	<b>2,65</b>
		<b>Sansedoni Siena, Siena</b>	<b>53.325</b>	<b>2,25</b>
		<b>Intesa Sanpaolo Spa</b>	<b>26.143</b>	<b>1,1</b>
		<b>Telecom Italia Spa</b>	<b>26.143</b>	<b>1,1</b>

Yes  No

3 Have there been any significant changes in the ownership (exceeding 5%) over the last five years?

If yes, please provide details:

On 31/03/2020 Libyan Foreign Bank (LFB) carried out an increase of share capital of € 101.325.070. The percentage of LFB has passed from 67% to 80%

4 Full details of any Ultimate Beneficial Owner (UBO)\*

\* see the abbreviation list at the end of this questionnaire

Name: **Sharef S. Alwan**

Percentage of ownership:

Title (position): **Chairman**

Date of birth: **01.01.1967**

Country of domicile: **Libya**

*Note: Please provide information on all UBOs by adding lines*

5 Full details of any Legal Representative\*

\* see the abbreviation list at the end of this questionnaire

Name: **Sharef S. Alwan**

Title (position): **Chairman**

Date of birth: **01.01.1967**

Country of domicile: **Libya**

6 Full details of any Proxy / Proxies\*

\* see the abbreviation list at the end of this questionnaire

7 Names of Members of the Board of Directors

Sharef S. Alwan (chairman)  
Antonio Piras (Vice chairman)  
Othoman Mohamed Alnouser  
Samuele Boscagli  
Saleh Amer Mohamed Edbayaa  
Abdalkhalig Mohamed M. Ibrahim  
Alaeddin Mokhtar Salim Msellati  
Mohammed Kamal Mokdad  
Abdulmonam Geat Ali Tbigha  
Rauf Ibrahim Gritli

8 Names of Members of the Top Management

9 Are there any Politically Exposed Persons (PEPs) in your institution as shareholders and/or members of the management and the board? Yes  No   
 If yes, please provide full names and details. We consider PEP all board members and senior management.

11 Is your FI an affiliate of depository institutions, credit union, or a foreign bank maintaining a physical presence at the place where it employs one or more persons on a full-time basis and maintains operating records related to its banking activities? Yes  No

**SECTION 3  
 NATURE OF YOUR CORE BUSINESS**

1 Please Describe your type of legal entity  
 Limited Company  
 Cooperative Bank  
 Joint-Stock Bank  
 Government-owned Bank (over 50 percent, direct or indirect)  
 Other, please specify:

2 **Business activities**  
 Please indicate areas of your business activities  
 Commercial Banking  
 Retail Banking  
 Investment Banking  
 Asset management  
 Private Banking (Wealth Management towards high net worth individuals)  
 Others, please specify:  
**Trade Finance, Syndication Oil & Energy**

**Products and services**

Please describe your main products and services

X Trade finance products (e.g. FX, letter of credit, ECA financing, et all)

- Lending activities
- Trust and asset management Services
- Investment Products (e.g. securities, commercial/government bonds)
- Correspondent banking
- Others, please specify:

3

Do your customers operate in the following areas?

- Gambling, Casinos (internet or otherwise)
- Nuclear
- Arms and munitions
- X Oil and other natural resources industries
- Precious metals or stones
- X Import Export and Trading
- Charities and NGOs
- X Embassies and consulates

4

If yes, please provide the approximate size in terms of revenues of such activities

Oil and other natural resources industries: 8%  
 Import Export and Trading: 77%  
 Embassies and consulates: 0,5%

4a

*Updated April 2021*

Does your FI have offshore-clients?  
 Offshore-client means post-office box companies in The British Virgin Islands, Panama etc. without physical presence and without operative business in the respective/registered country

Yes  No x

5

If yes, do you have an enhanced due diligence procedure for offshore clients in place

Please describe your customer's structure

Total number of customers:  
 Private individual (56%) Corporations (19 %)  
 Financial Institutions (25%)

6

*Updated May 2021*

Does your FI have customers/offer services in sanctioned countries (i.e. Iran, Syria, North Korea, Crimea)?

Yes  No X

7

8 Does your institution provide services to offshore banks, internet banks, institutions or banks located in high risk areas, as per GAFI/FATF recommendations? Yes X No

9 Does your FI offer "payable-through accounts?" Yes  No X  
 The term payable through accounts refers to correspondent accounts at your institution that are used directly by third parties to transact business on their own behalf. These accounts are different from typical correspondent banking accounts

9a If yes, please describe the level of due diligence procedure you are applying to these third parties.

10 Does your FI provide nested correspondent bank accounts? Yes  No x  
 Nested accounts occur when a financial institution accesses the financial system in another country (in effect anonymously) by operating through a correspondent banking account belonging to another financial

10a If yes, please provide the level of due diligence procedure you are applying

11 Does your FI have any business relationship with virtual currency providers (such as Bitcoin)? Yes  No x

**SECTION 4**

**ANTI-MONEY LAUNDERING LEGISLATION, POLICIES & PROCEDURES**

1 Is money laundering / terrorist financing considered as a crime in your country? Yes X No

2 Has your country established any laws/regulations concerning AML/CTF/KYC? Yes X No

If yes, please list the name of your country's relevant laws:

*Legislative decree n. 231/2007*

3 Does your country's regulatory body (Central Bank) require all financial institutions to have Anti Money Laundering (AML) & Know Your Customer (KYC) procedures? Yes X No

4	Is your FI subject to such laws/regulations?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
5	Does your FI have a formal independent AML-CTF/ Sanctions & Embargo compliance function?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
5a	Describe the governance and the structure of the AML-CFT/ Sanctions Embargoes compliance dept. including the approximate number of employees	Banca UBAE has anti-money laundering dept. within the Compliance department. The office is an independent function under the Board of Directors through the Control and Risk Committee. The department is composed of 5 members including the Compliance Officer who also holds the position of Head of AML Function.
6	How are AML issues escalated and what is the level and frequency of AML reporting?	At least two times per year and report on specific audit
7	What was the date of the last regulatory examinations?	January - April 2021
8	Did any findings and/or corrective actions result from the most recent examinations? If yes, please provide details.	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
9	Has your institution established a compliance program that contains AML/CTF/KYC policies and procedures, according to internal & international laws, rules and standards?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
10	<p>Do your AML/CTF/KYC policies and procedures allow to:</p> <ul style="list-style-type: none"> <li>• Open or maintain anonymous accounts?</li> <li>• Conduct business with the banks having no physical presence in any country i.e. shell banks?</li> <li>• Currently maintain accounts for shell banks?</li> </ul>	<p>Yes <input type="checkbox"/> No <input checked="" type="checkbox"/></p> <p>Yes <input type="checkbox"/> No <input checked="" type="checkbox"/></p> <p>Yes <input type="checkbox"/> No <input checked="" type="checkbox"/></p>

11	In case your institution does not have such policies and procedures, are they planned to be introduced? Please indicate the estimated date of their implementation.	Yes <input type="checkbox"/> No <input type="checkbox"/>
12	Has your bank developed an internal control function or other independent third-party assessing AML policies and practices on a regular basis?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
12a	What is the frequency of the review/assessment?	The internal audit dept. carries out at least one time per year
13	Does the AML compliance program require approval of your Institution's Board or a senior committee thereof?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
13a	If yes, how frequently is it updated?	On a constant basis
14	Do your policies cover relationships with PEP's?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
14a	Outlines these policies and how these risks are managed (identification, risk classification, validation).	Banca UBAE, with reference to new customers which fall in the category of PEP, applies the Enhanced Due Diligence Procedure. The opening of the account is subject to the approbation of the general management. The customers have a high-risk profile and it is monitored every sixth month.
15	Are the AML/CTF/KYC policies and procedures applicable to both your domestic and foreign branches?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
16	Is implementation of AML/CTF/KYC policies and procedures monitored on a permanent basis?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
17	Does your institution have a policy aimed at protecting personnel reporting any suspicious transaction?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
18	Does your FI have a requirement to collect information regarding its customers' business activities?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
19	Describe the minimum documentation requirements for new clients including the steps to verify their identity.	In general, with reference to new customers, the Bank requires proofs of their identity (i.e. copy of passport), official documents stating legal form/main activity; AML questionnaire; list of shareholders; personal data concerning any beneficial owners. All information is verified internally, and names are screened against blacklists. All identification information is reviewed for internal consistency: identification information must be consistent for each business partner on all identification documents.



How do you identify and verify the beneficial owner of your customers? Please describe your internal process and state acceptable sources

Banca UBAE has an office in charge of collect information about KYC. In particular, regarding the beneficial owner Banca UBAE obtains information by customers and then checked it through acceptable sources such as Bankers Almanac, CERVED and D&B report.

20

21 Does your FI have a process to review and, where appropriate, update customer information relating to high risk client information?

Yes X No

22 How frequently is customer due diligence/KYC information updated

Depending on the risk profile  
 For high risk profile every six months  
 For medium risk profile every year  
 For low risk profile every 3 years  
 For irrelevant profile every 5 years

23 Does your institution make a risk-focused assessment of its customer database and clients' transactions?

Yes X No

24 What factors and criteria are used to determine the customers' risk classification?

To determine customers' risk classification Banca UBAE considers the following factors:  
 Geographical area in which the customers is located  
 Type of transaction, products, services  
 Activity, reputation of the customer  
 In case of banks type of AML/CFT policies, controls in place, structure, activity, system, geographical area, reputation

25 Does your institution determine the appropriate level of enhanced due diligence necessary for those categories of customers and transactions that your institution has reason to deem as of high risk for illicit activities at or through your institution and when the customer has been not physically present for identification purposes?

Yes X No

26 Does your FI have monitoring program for unusual and potentially suspicious activity covering funds and transfers and monetary instruments such as travelers check, money orders, etc.?

Yes X No

27 What type of monitoring programmes are used to cover potentially suspicious activity?

x Automated  Manual

28 Are these programmes in-house or purchased solutions?

In-house  
 X Purchased – Name: GIANOS 3D provided by OASI

At high level, describe the parameters and thresholds of the system.

29

30 Are cash transactions included in the programs? Yes  No

31 Is there staff dedicated to the process alerts? Yes  No

32 Does your FI have a sanctions screening system that automatically detects a transaction which may involve any sanctioned party? Yes  No

32a Please describe the process. All the parties present in the transactions are checked by specific IT tool named "FastCheck" provided by Banca UBAE's outsourcer CEDACRI. Moreover, Banca UBAE uses other database such as Accuity Online Compliance in order to find further information about subjects involved in transactions

33 Is your Institution compliant with the FATCA legislation? Yes  No

If yes, please state your GIIN and FATCA status. **GIIN: EH5XW2.00010.ME.380**  
**FATCA STATUS: REPORTING MODEL 1 FFI**

34 Does your institution evaluate and gather information on its financial institution customers as well as their AML policies and procedures? Yes  No

35 Has your institution been subject to any investigation, indictment, conviction or civil enforcement action related to money laundering and terrorist financing in the past five years? Yes  No

36 Does your institution comply with GAFI/FATF provisions? Yes  No

**SECTION 5**  
**AML TRAINING INFORMATION**

1 Does your institution provide AML training to staff including identification and reporting of transactions that must be reported to government authorities, examples of different forms of money laundering involving financial institution's products and services and internal policies to prevent money laundering? Yes  No

2 Does your institution retain records of its training sessions including attendance records and relevant training material used? Yes  No

Please describe the frequency and the method of delivery. AML/CFT training consists of class-based courses provided by consulting firms and is delivered on an annual basis. It is provided to all personnel, with particular regards to employees that have direct contacts with customers as well as new personnel. Staff from Compliance Dept., Internal Audit and relevant managers are also requested to attend extra courses.

3

4

Does your institution have policies aimed at informing involved personnel of new AML related laws or changes to existing AML related policies or practices?

Yes X No

**SECTION 6**

**REQUIRED DOCUMENTS- In addition to this form, please provide the following items to us**

<p>AML POLICY</p>	<p><input type="checkbox"/> Attached</p> <p><input checked="" type="checkbox"/> Web- <a href="https://www.bancaubae.it/en/compliance/anti-money-laundering/">https://www.bancaubae.it/en/compliance/anti-money-laundering/</a></p> <p><input type="checkbox"/> Not Applicable-please provide reason</p>
<p>USA PATRIOT ACT CERTIFICATION Please provide the latest USA Patriot Certification</p>	<p><input type="checkbox"/> Attached</p> <p><input checked="" type="checkbox"/> Web <a href="https://www.bancaubae.it/en/compliance/anti-money-laundering/">https://www.bancaubae.it/en/compliance/anti-money-laundering/</a></p> <p><input type="checkbox"/> Not Applicable-please provide reason</p>
<p>WOLFSBERG AML QUESTIONNAIRE Please provide the latest Wolfsberg Questionnaire (CBDDQ V 1.2) prepared by your, or fill in the following format sheet (<u>Mandatory</u>)</p>	<p><input type="checkbox"/> Attached</p> <p><input checked="" type="checkbox"/> Web <a href="https://www.bancaubae.it/en/compliance/anti-money-laundering/">https://www.bancaubae.it/en/compliance/anti-money-laundering/</a></p>
<p>Annual report</p>	<p><input checked="" type="checkbox"/> Web- <a href="https://www.bancaubae.it/en/financials/">https://www.bancaubae.it/en/financials/</a></p> <p><input type="checkbox"/> Post mail</p>

**CONTACT DETAILS (details & title regarding the person who is entitled to sign this questionnaire)**

Has your institution appointed a Compliance Officer for AML/CTF/KYC?

Yes X No

If so, please give the name and title of the Compliance Officer in your institution, his/her email address, phone number, fax number for future references

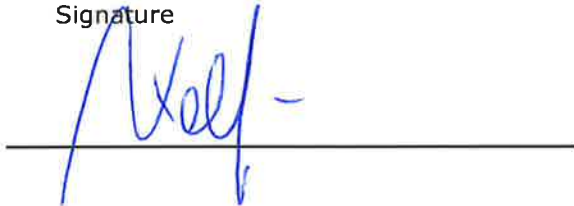
Name:

Mrs. Annabella **Colesanti**

Title: Compliance Officer and Head of AML Dept.  
Phone: +39 0642377709  
Fax: +39 0642076433  
E-mail: [annabella.colesanti@ubae.it](mailto:annabella.colesanti@ubae.it)  
Location: Via Quintino Sella 2, 00187 Rome Italy  
Date: 01/06/2021  
Signature:

Countersigned by General Manager: **Mr. Maurizio Valfrè**

Signature



**Abbreviations used in this questionnaire:**

**AML:** Anti-Money Laundering  
**KYC:** Know Your Customer  
**CTF:** Combating Terrorist Financing  
**GAFI/FATF :** Groupe d'Action Financière/Financial Action Task Force  
**PEPs :** Politically Exposed Persons

**ULTIMATE BENEFICIAL OWNER:** a) The individual who ultimately owns or controls the ownership or the indirect control of a percentage of shares or voting rights above 25%.  
b) The individual who otherwise wields control over the management of your bank ;  
c) In the case a) and b) are not applicable to identify the ultimate beneficial owner, the natural person(s) who hold the position of senior management official(s) are considered as ultimate beneficial owner.

**LEGAL REPRESENTATIVE:** the individual authorized to act in the name and on behalf of your good bank. The acts performed by the Legal Representative bear effects on your bank's juridical sphere. Representation powers are usually vested in either the bank's chairman or the managing directors.

**PROXY:** subjects authorized by competent bodies to manage ongoing relationships (such as current accounts, letters of credit, letters of guarantee, financing and similar) on the basis of a delegation provided by your bank's internal documentation.