

[Anti-Money Laundering / Know Your Customer Compliance Questionnaire]
Company Profile

Name of institution: **UBI Banca International S.A.**

SWIFT BIC: **CABI LULL**

Full address of the institution: **37A, Avenue J.F. Kennedy, L-1855 Luxembourg**

Website Address: **www.ubibanca.lu**

Place of registration: **Grand-Duchy of Luxembourg**

Main Business (Retail banking, Corporate banking, Investment banking etc.):

Private Banking & Commercial Banking

Outline of History: **member of the Italian banking group UBIBANCA, established October 1st, 1997 as CAB International SA, on April 19th, 1999 name changed to Banca Lombarda International S.A.. On July 21st, 2002 Artesia Bank Luxembourg SA merged into the above. On June 26th, 2007 name changed as above. On October 1st, 2007 BPU International SA merged into the above. In 2008 two foreign branches were opened in Munich (Germany) and Madrid (Spain) respectively. On December 10th, 2010 Banco di Brescia, Luxembourg Branch merged into the above.**

Legal Status: **Société Anonyme**

Banking License issued by **Commission de Surveillance du Secteur Financier, Luxembourg**

Auditor: **K P M G Audit Sa.r.l. - Luxembourg**

Affiliates, subsidiaries: _____ - _____

Shareholder's equity: _____ - _____

Ratings: _____ - _____

- 1) Bank's tax identification number (if any): **19972218475**
- 2) Number of employees: **98** (at December 31st, 2010)
- 3) Number of Domestic branches: **0**
- 4) Number of Foreign branches: **2**
- 5) Banking license type: _____ - _____ Year of issuance: **1997**

-Is your bank authorized to hold foreign currency accounts outside of your country?: **Yes**

-Are there any restriction on this authorization?: **No**

-Is your bank authorized to trade foreign exchange?: **Yes**

6) What type of financial products and services does your bank offer to your customers? :

All private banking and commercial banking products

7) Are your shares listed in any Stock Exchange Market(s)? : **No**

-If YES, in which Stock Exchange Market(s) and what is your stock symbol? : _____

8) Please list names of the primary regulatory body(ies) that supervise(s) your institution.:

Commission de Surveillance du Secteur Financier (C.S.S.F.)

9) Are there any specific laws and/or regulations in place covering Anti-Money Laundering?:

Yes

-If YES, please list them.

Laws of November 12th, 2004, July 17th, 2008 and October 27th, 2010

CSSF Circulars 04/155, 08/387 and 10/476

10) Do the laws / regulations in your jurisdiction limit or prohibit opening or maintenance of anonymous or numbered accounts? : **Yes**

11) Has your bank been fined or received any enforcement action by your regulator for a breach of Anti-Money Laundering legislation? : **No**

-If YES, please attach details.

12) Please list names of your principal Shareholders and percentage of ownership who own more than 5% shares of your bank.

Unione di Banche Italiane S.c.p.a. 90,61%

Banca Popolare di Bergamo S.p.A. 3,37%

Banco di Brescia S.p.A. 5,85%

Banco di San Giorgio 0,17%

13) Please list names and titles of Executive Management:

Massimo AMATO, Managing Director

Ettore PEZZUTO, Joint Director General

Giancarlo PLEBANI, Joint Director General

14) Please describe your customers' major business segments. Do they include the following business? : **No**

Casinos, Real estate agents, Dealers in precious metals and precious stones, Money Service Business, Lawyers, notaries, other independent legal professionals and accountants, Trust and service providers

15) Does your bank allow direct use of your correspondent accounts by your customers to transact business on their behalf? i.e. Do you allow Payable-through accounts*?

Please check one of the below answer.

() Yes. We do allow direct use of our correspondent accounts by our customers to transact business on their behalf.

() No. We do not allow direct use of our correspondent accounts by our customers to transact business on their behalf.

-If YES, please respond to the questions (15A) & (15B):

15A) Have you verified the identity of and performed on-going due diligence on your customers having direct access to your correspondent accounts?

15B) Are you able to provide relevant customer identification data upon request?

*Payable-through accounts : The above questions are based on Recommendation 7-(e) of FATF's "The Forty Recommendations". The background of the question is that "pass through account" is considered by the regulators as high risk for potential money laundering thus we need to verify that you have some kind of mechanism in place to reduce the risk of money laundering by asking you the additional questions (15A) and (15B) .

16) Please fill in the attached "Wolfsberg AML Questionnaire". If you have a ready-to-submit copy of the answer to the questionnaire, please provide it (see enclosure).

Name & Title: GRATZ François, Compliance Officer

Date: May 1st, 2011

Financial Institution Name: UBI BANCA INTERNATIONAL S.A.

Location: LUXEMBOURG, LUXEMBOURG

Anti-Money Laundering Questionnaire

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

I. General AML Policies, Practices and Procedures:	<u>Yes</u>	<u>No</u>
1. Is the AML compliance program approved by the FI's board or a senior committee?	Y 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?	Y 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?	Y 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?	Y 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>	Y 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?	Y x	N o
7. Does the FI have policies covering relationships with Politically Exposed Persons (PEP's), their family and close associates?	Y x	N o
8. Does the FI have record retention procedures that comply with applicable law?	Y 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 x	N o
II. Risk Assessment	<u>Yes</u>	<u>No</u>
10. Does the FI have a risk-based assessment of its customer base and their transactions?	Y 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?	Y x	N o
III. Know Your Customer, Due Diligence and Enhanced Due Diligence	<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?	Y x	N o

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13. Does the FI have a requirement to collect information regarding its customers' business activities?	Y x	N o
14. Does the FI assess its FI customers' AML policies or practices? FI customers are not within the bank's range of customers	Y o	N o
15. Does the FI have a process to review and, where appropriate, update customer information relating to high risk client information?	Y x	N o
16. Does the FI have procedures to establish a record for each new customer noting their respective identification documents and 'Know Your Customer' information?	Y x	N o
17. Does the FI complete a risk-based assessment to understand the normal and expected transactions of its customers?	Y x	N o
IV. Reportable Transactions and Prevention and Detection of Transactions with Illegally Obtained Funds	<u>Yes</u>	<u>No</u>
18. Does the FI have policies or practices for the identification and reporting of transactions that are required to be reported to the authorities?	Y x	N o
19. Where cash transaction reporting is mandatory, does the FI have procedures to identify transactions structured to avoid such obligations?	Y x	N o
20. Does the FI screen customers and transactions against lists of persons, entities or countries issued by government/competent authorities?	Y x	N o
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?	Y x	N o
V. Transaction Monitoring	<u>Yes</u>	<u>No</u>
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?	Y x	N o
VI. AML Training	<u>Yes</u>	<u>No</u>
23. Does the FI provide AML training to relevant employees that includes: <ul style="list-style-type: none"> ▪ Identification and reporting of transactions that must be reported to government authorities. ▪ Examples of different forms of money laundering involving the FI's products and services. ▪ Internal policies to prevent money laundering. 	Y x	N o
24. Does the FI retain records of its training sessions including attendance records and relevant training materials used?	Y x	N o
25. Does the FI communicate new AML related laws or changes to existing AML related policies or practices to relevant employees?	Y x	N o
26. Does the FI employ third parties to carry out some of the functions of the FI?	Y o	N 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"> ▪ Identification and reporting of transactions that must be reported to government authorities. ▪ Examples of different forms of money laundering involving the FI's products and services. ▪ Internal policies to prevent money laundering. 	Y o	N o

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.

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Space for additional information:

(Please indicate which question the information is referring to.)

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Name: Gratz François
Title: Compliance Officer
Signature:
Date: August 20th, 2010

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