



**GRUPPOMONTEPASCHI**

## **BIVERBANCA – CASSA DI RISPARMIO DI BIELLA E VERCELLI S.p.A. AML Declaration (September 2009)**

### **GENERAL DATA**

Company: Biverbanca-Cassa di Risparmio di Biella e Vercelli S.p.A.  
Registered office: Via Carso, 15 - 13900 Biella (BI) - Italy  
Tax code and VAT number: IT01807130024  
Phone number: +39 015 35081 Fax + 39 015 3508270  
Web site: [www.biverbanca.it](http://www.biverbanca.it)  
SWIFT code: CRBIIT2B

Biverbanca, established in 1994 from the merger between Cassa di Risparmio di Biella and Cassa di Risparmio di Vercelli (respectively founded in 1856 and 1851), is a dynamic and modern credit institution, deeply attached to its core region, whose aspirations it was able to promote over the years by providing financial support to the local community, with a special vocation for families and small-medium enterprises. The activities of Biverbanca are focused on Piedmont, in the area marked by the boundaries of the provinces of Biella and Vercelli, whose residents are used to regard the bank as “the bank next door”. The two districts are both highly industrious and, though dissimilar for historical reasons, complement each other in several ways. On the one hand, we find the Biella industrial region, characterized by its tradition in wool textiles. Almost half of the products manufactured in Biella, which boasts Italian fashion’s famous brands, are exported to neighbouring European countries and, to a lesser degree, to the Far East and the Americas. On the other, there is the Vercelli county, known for its extensive rice farming, making it the leading producer in Europe.

On 20 December 2007, Biverbanca became part of the Monte dei Paschi di Siena Group, being the third banking group in Italy with significant market shares in all the sectors in which it operates. Today Biverbanca counts more than 100 branches where about 700 people are employed. It operates by virtue of a license granted by the Bank of Italy, in accordance with the principles and objectives set forth by its Memorandum and Articles of Association and under the guide of its top management and parent company.

### **ANTI-MONEY LAUNDERING IN ITALY. LAWS AND REGULATIONS ISSUED TO COMBAT MONEY LAUNDERING AND TERRORISM FINANCING**

In Italy terrorism financing and the utilization of the financial system to launder money resulting from crimes are criminal offences (Criminal Code, articles 648-bis and 648-ter). Therefore, several laws and regulations were issued to combat these crimes, also in implementation of the EU rules (Directive No. 60/2005EC and 70/2006EC). Currently the subject is regulated by Law Decree No. 231 dated November, 21st 2007 (anti money laundering - Official Gazette No. 290 December, 14th 2007)) and Law Decree No. 109 dated June, 22nd 2007 (terrorism financing combat - Official Gazette No. 172 July, 26th 2007). It is also worth mentioning the “Operating instructions to identify suspicious transactions” document (also known as the “Decalogue”) issued by the Bank of Italy on 12 January 2001 (Official Gazette No. 37 of 14 February 2001) for companies operating in the banking, financial and insurance industry, in order to fully implement the addressee’s obligation of reporting any suspicious transaction.

## **THE BANK IS SUBJECT TO THE SUPERVISION OF THE AUTHORITIES RULING THE SUBJECT AND IMPLEMENTING THE RELATIVE INSPECTIONS**

The activities of qualified intermediaries (dealers of the banking and financial industry) are subject to the supervision and to the inspections carried out by the below-mentioned Authorities.

### **THE BANK OF ITALY AND THE "UNITA' DI INFORMAZIONE FINANZIARIA" (FINANCIAL INTELLIGENCE UNIT)**

While exercising its supervising and inspecting functions (see articles 53 and 54 of the Legislative Decree No. 385/ 1993 - Banking Act ) towards banks, the Bank of Italy issues the regulations provided for by law, takes measures within its specific area of competence and provides directives to intermediaries aimed at containing risks.

In July 2007, the Bank of Italy drew up a formal document known as "Compliance Supervisory Rules" where, although the discretionary power of individual intermediaries in choosing the best organizational solution was acknowledged, the creation of a special function was requested to banks to help them prevent and manage the risk of violation of rules, operating standards, deontological and ethical principles connected to financial intermediation activities.

The Bank of Italy carries out inspections on the anti-money laundering regulatory system of financial intermediaries and, in particular, verifies the compliance and the adequacy of their reporting procedures, customer identification and correct maintaining of a single data base, the AUI (Archivio Unico Informatico).

The Unità di Informazione Finanziaria - UIF (Financial Intelligence Unit), a specialized unit within the Bank of Italy, analyses financial flows with the aim of detecting and preventing money laundering or terrorism financing, receives reports of suspicious transactions and assesses them, gathers any additional information useful to carry out its institutional tasks and performs statistical analysis.

### **MINISTRY OF FINANCE AND TREASURY**

A decree of the Ministry of Finance and Treasury has established the criteria according to which the UIF analyses the aggregate data concerning the whole operating activity of each qualified intermediary to discover money laundering activities, if any, within certain geographical areas.

### **SPECIAL CURRENCY SQUAD OF THE TAX POLICE**

The special currency Squad of the Tax Police verifies the compliance with the provisions and monitors the reports of suspicious transactions forwarded by the UIF, informing the Anti-Mafia Chief Prosecutor if they concern organized crime or filing them, by notifying the investigatory bodies accordingly.

For further investigation and monitoring pursuant to applicable law, the special currency Squad also exercises powers assigned to it by currency laws and regulations. These powers are also extended to revenue officers of regional and provincial bodies of the Tax Police to whom the special currency Squad may delegate certain compliance duties provided for by the law.

### **THE BOARD OF STATUTORY AUDITORS**

The Board of Statutory Auditors (which is made up of three regular and two alternate Statutory Auditors, chosen from the Register of Certificated Auditors with the Ministry of Justice) plays an active role in elaborating adequate programmes and assessment procedures to verify the compliance with anti-money laundering and terrorism financing regulations and, in particular, with the obligations to report suspicious transactions. The Board, through the Internal Audit Staff, periodically verifies functionality and efficiency of these procedures and assesses the existence of quality conditions related to the operating trends of the Bank, of its organization structure and of distribution network.

**THE BANK HAS FUNCTIONS VERIFYING THE COMPLIANCE  
WITH AML AND TFC REGULATIONS**

At Biverbanca, the assessment of compliance with AML (Anti-Money Laundering) and TFC (Terrorist Financing Combat) requirements is performed by the following functions:

- Internal Audit Staff
- Compliance Department

For further information on our AML/KYC/TFC policies, please refer to our [AML/TFC and KYC Questionnaire](#).

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