

Anti-Money Laundering(AML)/Terrorism Financing Combat (TFC)/Know Your Customer(KYC) Questionnaire

FI general information

	Yes	No
1. Financial Institution (FI) Name: BIVERBANCA – CASSA DI RISPARMIO DI BIELLA E VERCELLI SPA		
2. Address, city, country: Via Carso 15 – 13900 Biella (BI) – Italy		
3. SWIFT code: CRBIT2B		
4. Please state the name of FI's regulatory Authority: BANCA D'ITALIA		
5. Is a Financial Intelligence Unit (FIU) established in your country?	Yes	
6. If you replied yes to the previous question, please state the name of the relevant Financial Intelligence Unit (FIU) in your country: BANCA D'ITALIA - UNITA' INFORMAZIONE FINANZIARIA (UIF)		
7. Is your FI publicly owned?		No
8. Is your FI listed on any stock exchange?		No
9. If yes, please state which stock(s) exchange(s) your Institution is traded on:		
1. General AML Policies, Practices and Procedures:		
10. Is the FI subject to laws and regulations regarding Anti Money Laundering/Terrorism Financing Combat?	Yes	
11. Is the AML/TFC compliance program approved by the FI's board or a senior committee?	Yes	
12. Does the FI have a legal and regulatory compliance program that includes a designated officer that is responsible for coordinating and overseeing the AML/TFC framework?	Yes	
13. Has the FI developed written policies documenting the processes that they have in place to prevent, detect and report suspicious transactions?	Yes	
14. 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/TFC policies and practices on a regular basis?	Yes	
15. Does the FI have a Compliance Officer?	Yes	
16. If yes, please write here below your Compliance Officer's name and email address: Compliance Officer's name: Mr Loriso Grometto, Head of Compliance Department Email address: l.grometto@biverbanca.it		
17. Does the FI have a policy prohibiting accounts/relationships with shell banks? (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.)	Yes	

18. Does the FI provide payable through accounts to correspondent banks? If your answer is no, please go to question 20.		No
19. If answer to the previous question is yes: is the FI satisfied, that the correspondent credit institution has verified the identity of and performed ongoing due diligence on the customers having direct access to accounts of the correspondent and that it is able to provide relevant customer due diligence data to the FI, upon request?		
20. 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?	Yes	
21. Does the FI have policies covering relationships with Politically Exposed Persons (PEP's), their family and close associates?	Yes	
22. Does the FI have record retention procedures that comply with applicable law?	Yes	
23. If you replied "yes" to the previous question, does the applicable law require to keep records for at least 5 years?	Yes	
24. Does the FI have foreign branches and/or subsidiaries?		No
25. If yes, is a list of your foreign branches and/or subsidiaries available on the Bankers' Almanac?		
26. If answer to the previous question is no, please list your foreign branches and/or subsidiaries using the field at the end of the questionnaire or additional sheets, if necessary.		
27. Are the FI's AML/TFC 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?	Yes	
28. Has the FI been subject to inspections by the relevant authorities with reference to AML/TFC regulations in the last 5 years?	Yes	
29. Has the FI ever been sanctioned as a result of non application of AML or anti terrorism laws/regulations? If yes, please provide details here below (use additional sheets if necessary):		No
30. Does the FI have in place any procedure to monitor and comply with international sanctions?	Yes	
31. If yes, which international sanctions are complied with (please tick here below, more than once if it is the case)? <input checked="" type="checkbox"/> UN <input checked="" type="checkbox"/> EU <input checked="" type="checkbox"/> OFAC <input type="checkbox"/> Other (please specify):		
II. Risk Assessment 32. Does the FI have a risk-based assessment of its customer base and their transactions?	Yes	
33. 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?	Yes	
III. Know Your Customer, Due Diligence and Enhanced Due Diligence 34. Has the FI implemented processes for the identification of those customers on whose behalf it maintains or operates accounts or conducts transactions?	Yes	
35. Does the FI have a requirement to collect information regarding its customers' business activities?	Yes	
36. Does the FI assess its FI customers' AML policies or practices?	Yes	
37. Does the FI have a process to review and, where appropriate, update customer information relating to high risk client information?	Yes	
38. Does the FI have procedures to establish a record for each new customer noting their respective identification documents and 'Know Your Customer' information?	Yes	
39. If yes, is the record kept for at least 5 years?	Yes	


40. Does the FI complete a risk-based assessment to understand the normal and expected transactions of its customers?	Yes	
41. Does the FI gather information on their customers' beneficial owner(s)?	Yes	
42. Does the FI provide services to non established ("walk in") customers?	Yes	
43. If yes, does the FI identify "walk in" customers?	Yes	
44. Do the laws and regulations in your country prohibit financial institutions to open anonymous accounts?	Yes	
45. Does the FI have any anonymous accounts in its books?		No
46. Is the FI offering anonymous accounts to its clients?		No
IV. Reportable Transactions and Prevention and Detection of Transactions with Illegally Obtained Funds		
47. Does the FI have policies or practices for the identification and reporting of transactions that are required to be reported to the authorities?	Yes	
48. Where cash transaction reporting is mandatory, does the FI have procedures to identify transactions structured to avoid such obligations?	Yes	
49. Does the FI screen customers and transactions against lists of persons, entities or countries issued by government/competent authorities?	Yes	
50. If yes, please specify which lists are used (tick here below, more than once if applicable): <input type="radio"/> UN <input checked="" type="checkbox"/> X <input type="radio"/> EU <input checked="" type="checkbox"/> X <input type="radio"/> OFAC <input checked="" type="checkbox"/> X <input type="radio"/> Other (please specify):		
51. 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?	Yes	
V. Transaction Monitoring		
52. 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?	Yes	
53. Does the national law applicable to the FI set a limit to the use of cash for transactions not handled through any financial institution?	Yes	
54. If yes, please write here below the current limit (amount and currency): <p style="text-align: center;">€ 999.99</p>		
VI. AML/TFC Training		
55. Does the FI provide AML/TFC training to relevant employees that includes: Identification and reporting of transactions that must be reported to government authorities Examples of different forms of money laundering/terrorism financing involving the FI's products and services Internal policies to prevent money laundering and terrorism financing ?	Yes	
56. Does the FI communicate new AML/TFC related laws or changes to existing AML related policies or practices to relevant employees?	Yes	
57. Does the FI employ third parties to carry out some of the functions of the FI?		No
58. If the answer to question 57 is yes, does the FI provide AML/TFC training to relevant third parties that includes: Identification and reporting of transactions that must be reported to government authorities, Examples of different forms of money laundering/terrorism financing involving the FI's products and services, Internal policies to prevent money laundering and terrorism financing?		

I confirm that I am authorised to complete this document and that, to the best of my knowledge, the information above is current and accurately reflects our institution's AML/TFC policies.

Name: Angelo Barbarulo

Title: General Manager

Signature:



Date: 14 december 2011

