

**the  
Wolfsberg  
Group**

Financial Institution Name:

Flowe S.p.A- Società Benefit

Location (Country) :

Basiglio (MI) - Italy

The questionnaire is required to be answered on a Legal Entity (LE) Level. The Financial Institution should answer the questionnaire at the legal entity level including any branches for which the client base, products and control model are materially similar to the LE Head Office. This questionnaire should not cover more than one LE. Each question in the CBDDQ will need to be addressed from the perspective of the LE and on behalf of all of its branches. If a response for the LE differs for one of its branches, this needs to be highlighted and details regarding this difference captured at the end of each sub-section. If a branch's business activity (products offered, client base etc.) is materially different than its Entity Head Office, a separate questionnaire can be completed for that branch.

No #	Question	Answer
<b>1. ENTITY &amp; OWNERSHIP</b>		
1	Full Legal Name	Flowe S.p.A. - Società Benefit
2	Append a list of foreign branches which are covered by this questionnaire	N/A
3	Full Legal (Registered) Address	Via Francesco Sforza 15 - Basiglio (MI) - Italy
4	Full Primary Business Address (if different from above)	N/A
5	Date of Entity incorporation/ establishment	19/07/2019
6	Select type of ownership and append an ownership chart if available	
6 a	Publicly Traded (25% of shares publicly traded)	Yes
6 a1	If Y, indicate the exchange traded on and ticker symbol	BORSA ITALIANA S.P.A. - BMED ticker IT0004776628
6 b	Member Owned/ Mutual	No
6 c	Government or State Owned by 25% or more	No
6 d	Privately Owned	No
6 d1	If Y, provide details of shareholders or ultimate beneficial owners with a holding of 10% or more	
7	% of the Entity's total shares composed of bearer shares	0%
8	Does the Entity, or any of its branches, operate under an Offshore Banking License (OBL) ?	No
8 a	If Y, provide the name of the relevant branch/es which operate under an OBL	
9	Name of primary financial regulator / supervisory authority	Bank Of Italy (Banca d'Italia)

<b>10</b>	Provide Legal Entity Identifier (LEI) if available	
<b>11</b>	Provide the full legal name of the ultimate parent (if different from the Entity completing the DDQ)	
<b>12</b>	Jurisdiction of licensing authority and regulator of ultimate parent	Italian jurisdiction
<b>13</b>	Select the business areas applicable to the Entity	
<b>13 a</b>	Retail Banking	Yes
<b>13 b</b>	Private Banking / Wealth Management	No
<b>13 c</b>	Commercial Banking	No
<b>13 d</b>	Transactional Banking	No
<b>13 e</b>	Investment Banking	No
<b>13 f</b>	Financial Markets Trading	No
<b>13 g</b>	Securities Services / Custody	No
<b>13 h</b>	Broker / Dealer	No
<b>13 i</b>	Multilateral Development Bank	No
<b>13 j</b>	Other	
<b>14</b>	Does the Entity have a significant (10% or more) portfolio of non-resident customers or does it derive more than 10% of its revenue from non-resident customers? (Non-resident means customers primarily resident in a different jurisdiction to the location where bank services are provided.)	No
<b>14 a</b>	If Y, provide the top five countries where the non-resident customers are located.	
<b>15</b>	Select the closest value:	
<b>15 a</b>	Number of employees	51-200
<b>15 b</b>	Total Assets	Less than \$10 million
<b>16</b>	Confirm that all responses provided in the above Section ENTITY & OWNERSHIP are representative of all the LE's branches	Yes
<b>16 a</b>	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
<b>16 b</b>	If appropriate, provide any additional information / context to the answers in this section.	

<b>2. PRODUCTS &amp; SERVICES</b>		
<b>17</b>	Does the Entity offer the following products and services:	
<b>17 a</b>	Correspondent Banking	No
<b>17 a1</b>	If Y	
<b>17 a2</b>	Does the Entity offer Correspondent Banking services to domestic banks?	
<b>17 a3</b>	Does the Entity allow domestic bank clients to provide downstream relationships?	
<b>17 a4</b>	Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks?	
<b>17 a5</b>	Does the Entity offer correspondent banking services to Foreign Banks?	
<b>17 a6</b>	Does the Entity allow downstream relationships with Foreign Banks?	
<b>17 a7</b>	Does the Entity have processes and procedures in place to identify downstream relationships with Foreign Banks?	
<b>17 a8</b>	Does the Entity offer correspondent banking services to regulated MSBs/MVTS?	
<b>17 a9</b>	Does the Entity allow downstream relationships with MSBs/MVTS?	
<b>17 a10</b>	Does the Entity have processes and procedures in place to identify downstream relationships with MSB /MVTS?	
<b>17 b</b>	Private Banking (domestic & international)	Yes
<b>17 c</b>	Trade Finance	No
<b>17 d</b>	Payable Through Accounts	No
<b>17 e</b>	Stored Value Instruments	No
<b>17 f</b>	Cross Border Bulk Cash Delivery	No
<b>17 g</b>	Domestic Bulk Cash Delivery	No
<b>17 h</b>	International Cash Letter	No
<b>17 i</b>	Remote Deposit Capture	No
<b>17 j</b>	Virtual /Digital Currencies	No
<b>17 k</b>	Low Price Securities	No
<b>17 l</b>	Hold Mail	No
<b>17 m</b>	Cross Border Remittances	Yes
<b>17 n</b>	Service to walk-in customers (non-account holders)	No
<b>17 o</b>	Sponsoring Private ATMs	No
<b>17 p</b>	Other high risk products and services identified by the Entity	
<b>18</b>	Confirm that all responses provided in the above Section PRODUCTS & SERVICES are representative of all the LE's branches	Yes
<b>18 a</b>	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
<b>18 b</b>	If appropriate, provide any additional information / context to the answers in this section.	

<b>3. AML, CTF &amp; SANCTIONS PROGRAMME</b>		
<b>19</b>	Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:	
<b>19 a</b>	Appointed Officer with sufficient experience/expertise	Yes
<b>19 b</b>	Cash Reporting	Not Applicable
<b>19 c</b>	CDD	Yes
<b>19 d</b>	EDD	Yes
<b>19 e</b>	Beneficial Ownership	Yes
<b>19 f</b>	Independent Testing	Yes
<b>19 g</b>	Periodic Review	Yes
<b>19 h</b>	Policies and Procedures	Yes
<b>19 i</b>	Risk Assessment	Yes
<b>19 j</b>	Sanctions	Yes
<b>19 k</b>	PEP Screening	Yes
<b>19 l</b>	Adverse Information Screening	Yes
<b>19 m</b>	Suspicious Activity Reporting	Yes
<b>19 n</b>	Training and Education	Yes
<b>19 o</b>	Transaction Monitoring	Yes
<b>20</b>	How many full time employees are in the Entity's AML, CTF & Sanctions Compliance Department?	10-50
<b>21</b>	Is the Entity's AML, CTF & Sanctions policy approved at least annually by the Board or equivalent Senior Management Committee?	Yes
<b>22</b>	Does the Board or equivalent Senior Management Committee receive regular reporting on the status of the AML, CTF & Sanctions programme?	Quarterly/Every three months
<b>23</b>	Does the Entity use third parties to carry out any components of its AML, CTF & Sanctions programme?	Yes
<b>23 a</b>	If Y, provide further details	AML Department of Banca Mediolanum S.p.A.
<b>24</b>	Confirm that all responses provided in the above Section AML, CTF & SANCTIONS Programme are representative of all the LE's branches	Yes
<b>24 a</b>	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
<b>24 b</b>	If appropriate, provide any additional information / context to the answers in this section.	

<b>4. ANTI BRIBERY &amp; CORRUPTION</b>		
25	Has the Entity documented policies and procedures consistent with applicable ABC regulations and requirements to [reasonably] prevent, detect and report bribery and corruption?	Yes
26	Does the Entity have an enterprise wide programme that sets minimum ABC standards?	Yes
27	Has the Entity appointed a designated officer or officers with sufficient experience/expertise responsible for coordinating the ABC programme?	Yes
28	Does the Entity have adequate staff with appropriate levels of experience/expertise to implement the ABC programme?	Yes
29	Is the Entity's ABC programme applicable to:	Not Applicable
30	Does the Entity have a global ABC policy that:	
30 a	Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage	Yes
30 b	Includes enhanced requirements regarding interaction with public officials?	Yes
30 c	Includes a prohibition against the falsification of books and records (this may be within the ABC policy or any other policy applicable to the Legal Entity)?	Yes
31	Does the Entity have controls in place to monitor the effectiveness of their ABC programme?	Yes
32	Does the Entity's Board or Senior Management Committee receive regular Management Information on ABC matters?	Yes
33	Does the Entity perform an Enterprise Wide ABC risk assessment?	Yes
33 a	If Y select the frequency	12 Months
34	Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment?	Yes
35	Does the Entity's ABC EWRA cover the inherent risk components detailed below:	
35 a	Potential liability created by intermediaries and other third-party providers as appropriate	Yes
35 b	Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries	Yes
35 c	Transactions, products or services, including those that involve state-owned or state-controlled entities or public officials	Yes
35 d	Corruption risks associated with gifts and hospitality, hiring/internships, charitable donations and political contributions	Yes
35 e	Changes in business activities that may materially increase the Entity's corruption risk	Yes
36	Does the Entity's internal audit function or other independent third party cover ABC Policies and Procedures?	No

<b>37</b>	Does the Entity provide mandatory ABC training to:	
<b>37 a</b>	Board and senior Committee Management	Yes
<b>37 b</b>	1st Line of Defence	Yes
<b>37 c</b>	2nd Line of Defence	Yes
<b>37 d</b>	3rd Line of Defence	Yes
<b>37 e</b>	3rd parties to which specific compliance activities subject to ABC risk have been outsourced	Yes
<b>37 f</b>	Non-employed workers as appropriate (contractors/consultants)	Yes
<b>38</b>	Does the Entity provide ABC training that is targeted to specific roles, responsibilities and activities?	Yes
<b>39</b>	Confirm that all responses provided in the above Section Anti Bribery & Corruption are representative of all the LE's branches	Yes
<b>39 a</b>	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
<b>39 b</b>	If appropriate, provide any additional information / context to the answers in this section.	

<b>5. AML, CTF &amp; SANCTIONS POLICIES &amp; PROCEDURES</b>		
<b>40</b>	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report:	
<b>40 a</b>	Money laundering	Yes
<b>40 b</b>	Terrorist financing	Yes
<b>40 c</b>	Sanctions violations	Yes
<b>41</b>	Are the Entity's policies and procedures updated at least annually?	Yes
<b>42</b>	Are the Entity's policies and procedures gapped against/compared to:	
<b>42 a</b>	US Standards	
<b>42 a1</b>	If Y, does the Entity retain a record of the results?	
<b>42 b</b>	EU Standards	Yes
<b>42 b1</b>	If Y, does the Entity retain a record of the results?	Yes
<b>43</b>	Does the Entity have policies and procedures that:	
<b>43 a</b>	Prohibit the opening and keeping of anonymous and fictitious named accounts	Yes
<b>43 b</b>	Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs	Yes
<b>43 c</b>	Prohibit dealing with other entities that provide banking services to unlicensed banks	Yes
<b>43 d</b>	Prohibit accounts/relationships with shell banks	Yes
<b>43 e</b>	Prohibit dealing with another entity that provides services to shell banks	Yes
<b>43 f</b>	Prohibit opening and keeping of accounts for Section 311 designated entities	Yes
<b>43 g</b>	Prohibit opening and keeping of accounts for any of unlicensed/unregulated remittance agents, exchanges houses, casa de cambio, bureaux de change or money transfer agents	Yes
<b>43 h</b>	Assess the risks of relationships with domestic and foreign PEPs, including their family and close associates	Yes
<b>43 i</b>	Define escalation processes for financial crime risk issues	Yes
<b>43 j</b>	Define the process, where appropriate, for terminating existing customer relationships due to financial crime risk	Yes
<b>43 k</b>	Specify how potentially suspicious activity identified by employees is to be escalated and investigated	Yes
<b>43 l</b>	Outline the processes regarding screening for sanctions, PEPs and negative media	Yes
<b>43 m</b>	Outline the processes for the maintenance of internal "watchlists"	Yes
<b>44</b>	Has the Entity defined a risk tolerance statement or similar document which defines a risk boundary around their business?	Yes
<b>45</b>	Does the Entity have a record retention procedures that comply with applicable laws?	Yes
<b>45 a</b>	If Y, what is the retention period?	5 years or more
<b>46</b>	Confirm that all responses provided in the above Section POLICIES & PROCEDURES are representative of all the LE's branches	Yes
<b>46 a</b>	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
<b>46 b</b>	If appropriate, provide any additional information / context to the answers in this section.	

<b>6. AML, CTF &amp; SANCTIONS RISK ASSESSMENT</b>		
<b>47</b>	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:	
<b>47 a</b>	Client	Yes
<b>47 b</b>	Product	Yes
<b>47 c</b>	Channel	Yes
<b>47 d</b>	Geography	Yes
<b>48</b>	Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below:	
<b>48 a</b>	Transaction Monitoring	Yes
<b>48 b</b>	Customer Due Diligence	Yes
<b>48 c</b>	PEP Identification	Yes
<b>48 d</b>	Transaction Screening	Yes
<b>48 e</b>	Name Screening against Adverse Media & Negative News	Yes
<b>48 f</b>	Training and Education	Yes
<b>48 g</b>	Governance	Yes
<b>48 h</b>	Management Information	Yes
<b>49</b>	Has the Entity's AML & CTF EWRA been completed in the last 12 months?	Yes
<b>49 a</b>	If N, provide the date when the last AML & CTF EWRA was completed.	
<b>50</b>	Does the Entity's Sanctions EWRA cover the inherent risk components detailed below:	
<b>50 a</b>	Client	Yes
<b>50 b</b>	Product	Yes
<b>50 c</b>	Channel	Yes
<b>50 d</b>	Geography	Yes



<b>51</b>	Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below:	
<b>51 a</b>	Customer Due Diligence	Yes
<b>51 b</b>	Transaction Screening	Yes
<b>51 c</b>	Name Screening	Yes
<b>51 d</b>	List Management	Yes
<b>51 e</b>	Training and Education	Yes
<b>51 f</b>	Governance	Yes
<b>51 g</b>	Management Information	Yes
<b>52</b>	Has the Entity's Sanctions EWRA been completed in the last 12 months?	Yes
<b>52 a</b>	If N, provide the date when the last Sanctions EWRA was completed.	
<b>53</b>	Confirm that all responses provided in the above Section AML, CTF & SANCTIONS RISK ASSESSMENT are representative of all the LE's branches	Yes
<b>53 a</b>	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
<b>53 b</b>	If appropriate, provide any additional information / context to the answers in this section.	

7. KYC, CDD and EDD		
54	Does the Entity verify the identity of the customer?	Yes
55	Do the Entity's policies and procedures set out when CDD must be completed, e.g. at the time of onboarding or within 30 days	Yes
56	Which of the following does the Entity gather and retain when conducting CDD? Select all that apply:	
56 a	Ownership structure	No
56 b	Customer identification	Yes
56 c	Expected activity	Yes
56 d	Nature of business/employment	Yes
56 e	Product usage	Yes
56 f	Purpose and nature of relationship	Yes
56 g	Source of funds	Yes
56 h	Source of wealth	Yes
57	Are each of the following identified:	
57 a	Ultimate beneficial ownership	No
57 a1	Are ultimate beneficial owners verified?	No
57 b	Authorised signatories (where applicable)	No
57 c	Key controllers	No
57 d	Other relevant parties	Target customers are only physical person (not legal entities)
58	What is the Entity's minimum (lowest) threshold applied to beneficial ownership identification ?	Other (Specify the percentage)
59	Does the due diligence process result in customers receiving a risk classification?	Yes

<b>60</b>	If Y, what factors/criteria are used to determine the customer's risk classification? Select all that apply:	
<b>60 a</b>	Product Usage	Yes
<b>60 b</b>	Geography	Yes
<b>60 c</b>	Business Type/Industry	Yes
<b>60 d</b>	Legal Entity type	No
<b>60 e</b>	Adverse Information	Yes
<b>60 f</b>	Other (specify)	Channel, Age, Source of Funds, nr. of AML case, nr. of trigger
<b>61</b>	Does the Entity have a risk based approach to screening customers for adverse media/negative news?	Yes
<b>62</b>	If Y, is this at:	
<b>62 a</b>	Onboarding	Yes
<b>62 b</b>	KYC renewal	Yes
<b>62 c</b>	Trigger event	Yes
<b>63</b>	What is the method used by the Entity to screen for adverse media / negative news?	Automated
<b>64</b>	Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?	Yes
<b>65</b>	If Y, is this at:	
<b>65 a</b>	Onboarding	Yes
<b>65 b</b>	KYC renewal	Yes
<b>65 c</b>	Trigger event	Yes
<b>66</b>	What is the method used by the Entity to screen PEPs?	Automated
<b>67</b>	Does the Entity have policies, procedures and processes to review and escalate potential matches from screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?	Yes
<b>68</b>	Does the Entity have a process to review and update customer information based on:	
<b>68 a</b>	KYC renewal	Yes
<b>68 b</b>	Trigger event	Yes
<b>69</b>	Does the Entity maintain and report metrics on current and past periodic or trigger event due diligence reviews?	Yes

<b>70</b>	From the list below, which categories of customers or industries are subject to EDD and/or are restricted, or prohibited by the Entity's FCC programme?	
<b>70 a</b>	Non-account customers	Do not have this category of customer or industry
<b>70 b</b>	Non-resident customers	Do not have this category of customer or industry
<b>70 c</b>	Shell banks	Prohibited
<b>70 d</b>	MVTS/ MSB customers	Prohibited
<b>70 e</b>	PEPs	EDD on a risk based approach
<b>70 f</b>	PEP Related	EDD on a risk based approach
<b>70 g</b>	PEP Close Associate	EDD on a risk based approach
<b>70 h</b>	Correspondent Banks	Do not have this category of customer or industry
<b>70 h1</b>	If EDD or EDD & restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2014?	Yes
<b>70 i</b>	Arms, defense, military	Do not have this category of customer or industry
<b>70 j</b>	Atomic power	Do not have this category of customer or industry
<b>70 k</b>	Extractive industries	Do not have this category of customer or industry
<b>70 l</b>	Precious metals and stones	Do not have this category of customer or industry
<b>70 m</b>	Unregulated charities	Do not have this category of customer or industry
<b>70 n</b>	Regulated charities	Do not have this category of customer or industry
<b>70 o</b>	Red light business / Adult entertainment	Do not have this category of customer or industry
<b>70 p</b>	Non-Government Organisations	Do not have this category of customer or industry
<b>70 q</b>	Virtual currencies	Do not have this category of customer or industry
<b>70 r</b>	Marijuana	Do not have this category of customer or industry
<b>70 s</b>	Embassies/Consulates	Do not have this category of customer or industry
<b>70 t</b>	Gambling	Do not have this category of customer or industry
<b>70 u</b>	Payment Service Provider	Do not have this category of customer or industry
<b>70 v</b>	Other (specify)	Target customers are only physical person (not legal entities)
<b>71</b>	If restricted, provide details of the restriction	
<b>72</b>	Does the Entity perform an additional control or quality review on clients subject to EDD?	Yes
<b>73</b>	Confirm that all responses provided in the above Section KYC, CDD and EDD are representative of all the LE's branches	Yes
<b>73 a</b>	If N, clarify which questions the difference/s relate to and the branch/es that this applies to	
<b>73 b</b>	If appropriate, provide any additional information / context to the answers in this section.	

<b>8. MONITORING &amp; REPORTING</b>		
<b>74</b>	Does the Entity have risk based policies, procedures and monitoring processes for the identification and reporting of suspicious activity?	Yes
<b>75</b>	What is the method used by the Entity to monitor transactions for suspicious activities?	Automated
<b>76</b>	If manual or combination selected, specify what type of transactions are monitored manually	
<b>77</b>	Does the Entity have regulatory requirements to report suspicious transactions?	Yes
<b>77 a</b>	If Y, does the Entity have policies, procedures and processes to comply with suspicious transaction reporting requirements?	Yes
<b>78</b>	Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity?	Yes
<b>79</b>	Confirm that all responses provided in the above Section MONITORING & REPORTING are representative of all the LE's branches	Yes
<b>79 a</b>	If N, clarify which questions the difference/s relate to and the branch/es that this applies to	
<b>79 b</b>	If appropriate, provide any additional information / context to the answers in this section.	

<b>9. PAYMENT TRANSPARENCY</b>		
<b>80</b>	Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards?	Yes
<b>81</b>	Does the Entity have policies, procedures and processes to [reasonably] comply with and have controls in place to ensure compliance with:	
<b>81 a</b>	FATF Recommendation 16	Yes
<b>81 b</b>	Local Regulations	Yes
<b>81 b1</b>	Specify the regulation	Directive UE 2018/843. In Italian: Legislative Decree 2007/231 and 2007/109. The decrees by the Ministry of Economic Affairs and Finance and the tables of anomalous behaviour issued by the Financial Intelligence Unit (UIF) complete the applicable framework at national level.
<b>81 c</b>	If N, explain	
<b>82</b>	Does the Entity have processes in place to respond to Request For Information (RFIs) from other entities in a timely manner?	Yes
<b>83</b>	Does the Entity have controls to support the inclusion of required and accurate originator information in international payment messages?	Yes
<b>84</b>	Does the Entity have controls to support the inclusion of required beneficiary information international payment messages?	Yes
<b>85</b>	Confirm that all responses provided in the above Section PAYMENT TRANSPARENCY are representative of all the LE's branches	Yes
<b>85 a</b>	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
<b>85 b</b>	If appropriate, provide any additional information / context to the answers in this section.	

<b>10. SANCTIONS</b>		
<b>86</b>	Does the Entity have a Sanctions Policy approved by management regarding compliance with sanctions law applicable to the Entity, including with respect its business conducted with, or through accounts held at foreign financial institutions?	Yes
<b>87</b>	Does the Entity have policies, procedures, or other controls reasonably designed to prevent the use of another entity's accounts or services in a manner causing the other entity to violate sanctions prohibitions applicable to the other entity (including prohibitions within the other entity's local jurisdiction)?	Yes
<b>88</b>	Does the Entity have policies, procedures or other controls reasonably designed to prohibit and/or detect actions taken to evade applicable sanctions prohibitions, such as stripping, or the resubmission and/or masking, of sanctions relevant information in cross border transactions?	Yes
<b>89</b>	Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists?	Yes
<b>90</b>	What is the method used by the Entity?	Automated
<b>91</b>	Does the Entity screen all sanctions relevant data, including at a minimum, entity and location information, contained in cross border transactions against Sanctions Lists?	Yes
<b>92</b>	What is the method used by the Entity?	Automated
<b>93</b>	Select the Sanctions Lists used by the Entity in its sanctions screening processes:	
<b>93 a</b>	Consolidated United Nations Security Council Sanctions List (UN)	Used for screening customers and beneficial owners and for filtering transactional data
<b>93 b</b>	United States Department of the Treasury's Office of Foreign Assets Control (OFAC)	Used for screening customers and beneficial owners and for filtering transactional data
<b>93 c</b>	Office of Financial Sanctions Implementation HMT (OFSI)	Used for screening customers and beneficial owners and for filtering transactional data
<b>93 d</b>	European Union Consolidated List (EU)	Used for screening customers and beneficial owners and for filtering transactional data
<b>93 e</b>	Lists maintained by other G7 member countries	Used for screening customers and beneficial owners and for filtering transactional data
<b>93 f</b>	Other (specify)	List of Italian Local Politicians
<b>94</b>	Question removed	
<b>95</b>	When regulatory authorities make updates to their Sanctions list, how many business days before the entity updates their active manual and/or automated screening systems against:	
<b>95 a</b>	Customer Data	Same day to 2 business days
<b>95 b</b>	Transactions	Same day to 2 business days

96	Does the Entity have a physical presence, e.g., branches, subsidiaries, or representative offices located in countries/regions against which UN, OFAC, OFSI, EU and G7 member countries have enacted comprehensive jurisdiction-based Sanctions?	No
97	Confirm that all responses provided in the above Section SANCTIONS are representative of all the LE's branches	Yes
97 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
97 b	If appropriate, provide any additional information / context to the answers in this section.	



<b>11. TRAINING &amp; EDUCATION</b>		
<b>98</b>	Does the Entity provide mandatory training, which includes :	
<b>98 a</b>	Identification and reporting of transactions to government authorities	Yes
<b>98 b</b>	Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered	Yes
<b>98 c</b>	Internal policies for controlling money laundering, terrorist financing and sanctions violations	Yes
<b>98 d</b>	New issues that occur in the market, e.g., significant regulatory actions or new regulations	Yes
<b>98 e</b>	Conduct and Culture	Yes
<b>99</b>	Is the above mandatory training provided to :	
<b>99 a</b>	Board and Senior Committee Management	Yes
<b>99 b</b>	1st Line of Defence	Yes
<b>99 c</b>	2nd Line of Defence	Yes
<b>99 d</b>	3rd Line of Defence	Yes
<b>99 e</b>	3rd parties to which specific FCC activities have been outsourced	Yes
<b>99 f</b>	Non-employed workers (contractors/consultants)	Yes
<b>100</b>	Does the Entity provide AML, CTF & Sanctions training that is targeted to specific roles, responsibilities and high risk products, services and activities?	Yes
<b>101</b>	Does the Entity provide customised training for AML, CTF and Sanctions staff?	Yes
<b>102</b>	Confirm that all responses provided in the above Section TRAINING & EDUCATION are representative of all the LE's branches	Yes
<b>102 a</b>	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
<b>102 b</b>	If appropriate, provide any additional information / context to the answers in this section.	

<b>12. QUALITY ASSURANCE /COMPLIANCE TESTING</b>		
<b>103</b>	Are the Entity's KYC processes and documents subject to quality assurance testing?	No
<b>104</b>	Does the Entity have a program wide risk based Compliance Testing process (separate to the independent Audit function)?	No
<b>105</b>	Confirm that all responses provided in the above Section QUALITY ASSURANCE / COMPLIANCE TESTING are representative of all the LE's branches	Yes
<b>105 a</b>	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
<b>105 b</b>	If appropriate, provide any additional information / context to the answers in this section.	

<b>13. AUDIT</b>		
<b>106</b>	In addition to inspections by the government supervisors/regulators, does the Entity have an internal audit function, a testing function or other independent third party, or both, that assesses FCC AML, CTF and Sanctions policies and practices on a regular basis?	Yes
<b>107</b>	How often is the Entity audited on its AML, CTF & Sanctions programme by the following:	
<b>107 a</b>	Internal Audit Department	Component based reviews
<b>107 b</b>	External Third Party	Component based reviews
<b>108</b>	Does the internal audit function or other independent third party cover the following areas:	
<b>108 a</b>	AML, CTF & Sanctions policy and procedures	Yes
<b>108 b</b>	KYC / CDD / EDD and underlying methodologies	Yes
<b>108 c</b>	Transaction Monitoring	Yes
<b>108 d</b>	Transaction Screening including for sanctions	Yes
<b>108 e</b>	Name Screening & List Management	Yes
<b>108 f</b>	Training & Education	Yes
<b>108 g</b>	Technology	Yes
<b>108 h</b>	Governance	Yes
<b>108 i</b>	Reporting/Metrics & Management Information	Yes
<b>108 j</b>	Suspicious Activity Filing	Yes
<b>108 k</b>	Enterprise Wide Risk Assessment	Yes
<b>108 l</b>	Other (specify)	
<b>109</b>	Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness?	Yes
<b>110</b>	Confirm that all responses provided in the above section, AUDIT are representative of all the LE's branches	Yes
<b>110 a</b>	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
<b>110 b</b>	If appropriate, provide any additional information / context to the answers in this section.	

**Declaration Statement**

Wolfsberg Group Correspondent Banking Due Diligence Questionnaire 2020 (CBDDQ V1.3)

Declaration Statement (To be signed by Global Head of Correspondent Banking or equivalent position holder AND Group Money Laundering Prevention Officer, Global Head of Anti- Money Laundering, Chief Compliance Officer, Global Head of Financial Crimes Compliance OR equivalent)

FLOWE SPA - SOCIETA' BENEFIT \_\_\_\_\_ (Financial Institution name) is fully committed to the fight against financial crime and makes every effort to remain in full compliance with all applicable financial crime laws, regulations and standards in all of the jurisdictions in which it does business and holds accounts.

The Financial Institution understands the critical importance of having effective and sustainable controls to combat financial crime in order to protect its reputation and to meet its legal and regulatory obligations.

The Financial Institution recognises the importance of transparency regarding parties to transactions in international payments and has adopted/is committed to adopting these standards.

The Financial Institution further certifies it complies with / is working to comply with the Wolfsberg Correspondent Banking Principles and the Wolfsberg Trade Finance Principles. The information provided in thisWolfsberg CBDDQ will be kept current and will be updated no less frequently than on an annual basis.

The Financial Institution commits to file accurate supplemental information on a timely basis.

I, \_\_\_\_\_ (Global Head of Correspondent Banking or equivalent), certify that I have read and understood this declaration, that the answers provided in this Wolfsberg CBDDQ are complete and correct to my honest belief, and that I am authorised to execute this declaration on behalf of the Financial Institution.

I, MARCO VALCAVI \_\_\_\_\_ (MLRO or equivalent), certify that I have read and understood this declaration, that the answers provided in this Wolfsberg CBDDQ are complete and correct to my honest belief, and that I am authorised to execute this declaration on behalf of the Financial Institution.

\_\_\_\_\_  
(Signature & Date)

28 OTTOBRE 2021 \_\_\_\_\_  
(Signature & Date)