the Wolfsberg Group

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|---|---|
| **Financial Institution Name:** | **BFF Bank S.p.A.** |
| **Location (Country) :** | **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 |
|---|---|---|
| **1. ENTITY & OWNERSHIP** | | |
| **1** | Full Legal Name | BFF Bank S.p.A., Parent Company of BFF Banking Group |
| **2** | Append a list of foreign branches which are covered by this questionnaire | BFF Bank S.p.A. Sucursal en España; BFF Bank S.p.A. Sucursal em Portugal; BFF Bank Spółka Akcyjna Oddział w Polsce; BFF Bank S.p.A. Ελληνικό Υποκατάστημα; BFF Finance Iberia S.A.; BFF Polska S.A.; BFF Medfinance S.A.; BFF Central Europe s.r.o.; BFF Česka Republika s.r.o. |
| **3** | Full Legal (Registered) Address | Viale Scarampo 15, 20148, Milano, Italy |
| **4** | Full Primary Business Address (if different from above) | |
| **5** | Date of Entity incorporation/establishment | 22/07/1985 |
| **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 | MTA segment - ISIN IT0005244402 |
| **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** | Does the Bank have a Virtual Bank License or provide services only through online channels? | no |
| **10** | Name of primary financial regulator/supervisory authority | Bank of Italy - CONSOB |
| **11** | Provide Legal Entity Identifier (LEI) if available | 815600522538355AE429 |
| **12** | Provide the full legal name of the ultimate parent (if different from the Entity completing the DDQ) | |
| **13** | Jurisdiction of licensing authority and regulator of ultimate parent | |
| **14** | Select the business areas applicable to the Entity | |
| **14 a** | Retail Banking | No |
| **14 b** | Private Banking | No |

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| **14 c** | Commercial Banking | Yes |
| **14 d** | Transactional Banking | Yes |
| **14 e** | Investment Banking | No |
| **14 f** | Financial Markets Trading | No |
| **14 g** | Securities Services/Custody | Yes |
| **14 h** | Broker/Dealer | No |
| **14 i** | Multilateral Development Bank | No |
| **14 j** | Wealth Management | No |
| **14 k** | Other (please explain) | Payments Services;<br>Depositary Bank |
| **15** | 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 |
| **15 a** | If Y, provide the top five countries where the non-resident customers are located. | |
| **16** | Select the closest value: | |
| **16 a** | Number of employees | 501-1000 |
| **16 b** | Total Assets | Greater than $500 million |
| **17** | Confirm that all responses provided in the above Section are representative of all the LE's branches. | Yes |
| **17 a** | If N, clarify which questions the difference/s relate to and the branch/es that this applies to. | |
| **18** | If appropriate, provide any additional information/context to the answers in this section. | |

## 2. PRODUCTS & SERVICES

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|---|---|---|
| **19** | Does the Entity offer the following products and services: | |
| **19 a** | Correspondent Banking | Yes |
| **19 a1** | If Y | |
| **19 a1a** | Does the Entity offer Correspondent Banking services to domestic banks? | Yes |
| **19 a1b** | Does the Entity allow domestic bank clients to provide downstream relationships? | No |
| **19 a1c** | Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks? | Yes |
| **19 a1d** | Does the Entity offer Correspondent Banking services to foreign banks? | Yes |
| **19 a1e** | Does the Entity allow downstream relationships with foreign banks? | Yes |
| **19 a1f** | Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks? | Yes |
| **19 a1g** | Does the Entity offer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTSs)? | No |
| **19 a1h** | Does the Entity allow downstream relationships with MSBs, MVTSs, or Payment Service Provider (PSPs)? | |
| **19 a1h1** | MSBs | No |
| **19 a1h2** | MVTSs | No |
| **19 a1h3** | PSPs | Yes |

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| **19 a1i** | Does the Entity have processes and procedures in place to identify downstream relationships with MSBs /MVTSs/PSPs? | Yes |
| **19 b** | Cross-Border Bulk Cash Delivery | No |
| **19 c** | Cross-Border Remittances | No |
| **19 d** | Domestic Bulk Cash Delivery | No |
| **19 e** | Hold Mail | No |
| **19 f** | International Cash Letter | No |
| **19 g** | Low Price Securities | No |
| **19 h** | Payable Through Accounts | No |
| **19 i** | Payment services to non-bank entities who may then offer third party payment services to their customers? | No |
| **19 i1** | If Y , please select all that apply below? | |
| **19 i2** | Third Party Payment Service Providers | |
| **19 i3** | Virtual Asset Service Providers (VASPs) | |
| **19 i4** | eCommerce Platforms | |
| **19 i5** | Other - Please explain | |
| **19 j** | Private Banking | No |
| **19 k** | Remote Deposit Capture (RDC) | No |
| **19 l** | Sponsoring Private ATMs | No |
| **19 m** | Stored Value Instruments | No |
| **19 n** | Trade Finance | No |
| **19 o** | Virtual Assets | *No* |
| **19 p** | For each of the following please state whether you offer the service to walk-in customers and if so, the applicable level of due diligence: | |
| **19 p1** | Check cashing service | No |
| **19 p1a** | If yes, state the applicable level of due diligence | |
| **19 p2** | Wire transfers | No |
| **19 p2a** | If yes, state the applicable level of due diligence | |
| **19 p3** | Foreign currency conversion | No |
| **19 p3a** | If yes, state the applicable level of due diligence | |
| **19 p4** | Sale of Monetary Instruments | No |
| **19 p4a** | If yes, state the applicable level of due diligence | |
| **19 p5** | If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. | |
| **19 q** | Other high-risk products and services identified by the Entity (please specify) | |
| **20** | Confirm that all responses provided in the above Section are representative of all the LE's branches. | Yes |
| **20 a** | If N, clarify which questions the difference/s relate to and the branch/es that this applies to. | |
| **21** | If appropriate, provide any additional information/context to the answers in this section. | |

## 3. AML, CTF & SANCTIONS PROGRAMME

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| **22** | Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: | |
| **22 a** | Appointed Officer with sufficient experience/expertise | Yes |
| **22 b** | Adverse Information Screening | Yes |
| **22 c** | Beneficial Ownership | Yes |
| **22 d** | Cash Reporting | Yes |
| **22 e** | CDD | Yes |
| **22 f** | EDD | Yes |
| **22 g** | Independent Testing | Yes |
| **22 h** | Periodic Review | Yes |
| **22 i** | Policies and Procedures | Yes |
| **22 j** | PEP Screening | Yes |
| **22 k** | Risk Assessment | Yes |
| **22 l** | Sanctions | Yes |

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| **22 m** | Suspicious Activity Reporting | Yes |
| **22 n** | Training and Education | Yes |
| **22 o** | Transaction Monitoring | Yes |
| **23** | How many full time employees are in the Entity's AML, CTF & Sanctions Compliance Department? | 1-10 |
| **24** | Is the Entity's AML, CTF & Sanctions policy approved at least annually by the Board or equivalent Senior Management Committee? If N, describe your practice in Question 29. | Yes |
| **25** | Does the Board receive, assess, and challenge regular reporting on the status of the AML, CTF, & Sanctions programme? | Yes |
| **26** | Does the Entity use third parties to carry out any components of its AML, CTF & Sanctions programme? | No |
| **26 a** | If Y, provide further details | |
| **27** | Does the entity have a whistleblower policy? | Yes |
| **28** | Confirm that all responses provided in the above Section are representative of all the LE's branches | Yes |
| **28 a** | If N, clarify which questions the difference/s relate to and the branch/es that this applies to. | |
| **29** | If appropriate, provide any additional information/context to the answers in this section. | |
| **4. ANTI BRIBERY & CORRUPTION** | | |
| **30** | Has the Entity documented policies and procedures consistent with applicable ABC regulations and requirements to reasonably prevent, detect and report bribery and corruption? | Yes |
| **31** | Does the Entity have an enterprise wide programme that sets minimum ABC standards? | Yes |
| **32** | Has the Entity appointed a designated officer or officers with sufficient experience/expertise responsible for coordinating the ABC programme? | Yes |
| **33** | Does the Entity have adequate staff with appropriate levels of experience/expertise to implement the ABC programme? | Yes |
| **34** | Is the Entity's ABC programme applicable to: | Not Applicable |
| **35** | Does the Entity have a global ABC policy that: | |
| **35 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 |
| **35 b** | Includes enhanced requirements regarding interaction with public officials? | Yes |
| **35 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 |
| **36** | Does the Entity have controls in place to monitor the effectiveness of their ABC programme? | Yes |
| **37** | Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme? | Yes |
| **38** | Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months? | Yes |
| **38 a** | If N, provide the date when the last ABC EWRA was completed. | |
| **39** | Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment? | Yes |
| **40** | Does the Entity's ABC EWRA cover the inherent risk components detailed below: | |
| **40 a** | Potential liability created by intermediaries and other third-party providers as appropriate | Yes |
| **40 b** | Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries | Yes |
| **40 c** | Transactions, products or services, including those that involve state-owned or state-controlled entities or public officials | Yes |
| **40 d** | Corruption risks associated with gifts and hospitality, hiring/internships, charitable donations and political contributions | Yes |

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| **40 e** | Changes in business activities that may materially increase the Entity's corruption risk | Yes |
| **41** | Does the Entity's internal audit function or other independent third party cover ABC Policies and Procedures? | Yes |
| **42** | Does the Entity provide mandatory ABC training to: | |
| **42 a** | Board and senior Committee Management | Yes |
| **42 b** | 1st Line of Defence | Yes |
| **42 c** | 2nd Line of Defence | Yes |
| **42 d** | 3rd Line of Defence | Yes |
| **42 e** | Third parties to which specific compliance activities subject to ABC risk have been outsourced | Not Applicable |
| **42 f** | Non-employed workers as appropriate (contractors/consultants) | Yes |
| **43** | Does the Entity provide ABC training that is targeted to specific roles, responsibilities and activities? | Yes |
| **44** | Confirm that all responses provided in the above Section are representative of all the LE's branches | Yes |
| **44 a** | If N, clarify which questions the difference/s relate to and the branch/es that this applies to. | |
| **45** | If appropriate, provide any additional information/context to the answers in this section. | |
| **5. AML, CTF & SANCTIONS POLICIES & PROCEDURES** | | |
| **46** | Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: | |
| **46 a** | Money laundering | Yes |
| **46 b** | Terrorist financing | Yes |
| **46 c** | Sanctions violations | Yes |
| **47** | Are the Entity's policies and procedures updated at least annually? | Yes |
| **48** | Has the Entity chosen to compare its policies and procedures against: | |
| **48 a** | U.S. Standards | No |
| **48 a1** | If Y, does the Entity retain a record of the results? | |
| **48 b** | EU Standards | Yes |
| **48 b1** | If Y, does the Entity retain a record of the results? | Yes |
| **49** | Does the Entity have policies and procedures that: | |
| **49 a** | Prohibit the opening and keeping of anonymous and fictitious named accounts | Yes |
| **49 b** | Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs | Yes |
| **49 c** | Prohibit dealing with other entities that provide banking services to unlicensed banks | Yes |
| **49 d** | Prohibit accounts/relationships with shell banks | Yes |
| **49 e** | Prohibit dealing with another entity that provides services to shell banks | Yes |
| **49 f** | Prohibit opening and keeping of accounts for Section 311 designated entities | Yes |
| **49 g** | 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 |
| **49 h** | Assess the risks of relationships with domestic and foreign PEPs, including their family and close associates | Yes |

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| **49 i** | Define the process for escalating financial crime risk issues/potentially suspicious activity identified by employees | Yes |
| **49 j** | Define the process, where appropriate, for terminating existing customer relationships due to financial crime risk | Yes |
| **49 k** | Define the process for exiting clients for financial crime reasons that applies across the entity, including foreign branches and affiliates | Yes |
| **49 l** | Define the process and controls to identify and handle customers that were previously exited for financial crime reasons if they seek to re-establish a relationship | Yes |
| **49 m** | Outline the processes regarding screening for sanctions, PEPs and Adverse Media/Negative News | Yes |
| **49 n** | Outline the processes for the maintenance of internal "watchlists" | No |
| **50** | Has the Entity defined a risk tolerance statement or similar document which defines a risk boundary around their business? | Yes |
| **51** | Does the Entity have record retention procedures that comply with applicable laws? | Yes |
| **51 a** | If Y, what is the retention period? | 5 years or more |
| **52** | Confirm that all responses provided in the above Section are representative of all the LE's branches | Yes |
| **52 a** | If N, clarify which questions the difference/s relate to and the branch/es that this applies to. | |
| **53** | If appropriate, provide any additional information/context to the answers in this section. | |
| **6. AML, CTF & SANCTIONS RISK ASSESSMENT** | | |
| **54** | Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: | |
| **54 a** | Client | Yes |
| **54 b** | Product | Yes |
| **54 c** | Channel | Yes |
| **54 d** | Geography | Yes |
| **55** | Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: | |
| **55 a** | Transaction Monitoring | Yes |
| **55 b** | Customer Due Diligence | Yes |
| **55 c** | PEP Identification | Yes |
| **55 d** | Transaction Screening | Yes |
| **55 e** | Name Screening against Adverse Media/Negative News | Yes |
| **55 f** | Training and Education | Yes |
| **55 g** | Governance | Yes |
| **55 h** | Management Information | Yes |
| **56** | Has the Entity's AML & CTF EWRA been completed in the last 12 months? | Yes |
| **56 a** | If N, provide the date when the last AML & CTF EWRA was completed. | |
| **57** | Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: | |
| **57 a** | Client | Yes |
| **57 b** | Product | Yes |
| **57 c** | Channel | Yes |
| **57 d** | Geography | Yes |
| **58** | Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: | |
| **58 a** | Customer Due Diligence | Yes |
| **58 b** | Governance | Yes |
| **58 c** | List Management | Yes |
| **58 d** | Management Information | Yes |

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| **58 e** | Name Screening | Yes |
| **58 f** | Transaction Screening | Yes |
| **58 g** | Training and Education | Yes |
| **59** | Has the Entity's Sanctions EWRA been completed in the last 12 months? | Yes |
| **59 a** | If N, provide the date when the last Sanctions EWRA was completed. | |
| **60** | Confirm that all responses provided in the above Section are representative of all the LE's branches | Yes |
| **60 a** | If N, clarify which questions the difference/s relate to and the branch/es that this applies to. | |
| **61** | If appropriate, provide any additional information/context to the answers in this section. | |
| **7. KYC, CDD and EDD** | | |
| **62** | Does the Entity verify the identity of the customer? | Yes |
| **63** | 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 |
| **64** | Which of the following does the Entity gather and retain when conducting CDD? Select all that apply: | |
| **64 a** | Customer identification | Yes |
| **64 b** | Expected activity | Yes |
| **64 c** | Nature of business/employment | Yes |
| **64 d** | Ownership structure | Yes |
| **64 e** | Product usage | Yes |
| **64 f** | Purpose and nature of relationship | Yes |
| **64 g** | Source of funds | Yes |
| **64 h** | Source of wealth | Yes |
| **65** | Are each of the following identified: | |
| **65 a** | Ultimate beneficial ownership | Yes |
| **65 a1** | Are ultimate beneficial owners verified? | Yes |
| **65 b** | Authorised signatories (where applicable) | Yes |
| **65 c** | Key controllers | Yes |
| **65 d** | Other relevant parties | Yes |
| **66** | What is the Entity's minimum (lowest) threshold applied to beneficial ownership identification? | 25% |
| **67** | Does the due diligence process result in customers receiving a risk classification? | Yes |
| **67 a** | If Y, what factors/criteria are used to determine the customer's risk classification? Select all that apply: | |
| **67 a1** | Product Usage | Yes |
| **67 a2** | Geography | Yes |
| **67 a3** | Business Type/Industry | Yes |
| **67 a4** | Legal Entity type | Yes |
| **67 a5** | Adverse Information | Yes |
| **67 a6** | Other (specify) | PEPs, Sanctions List |
| **68** | For high risk non-individual customers, is a site visit a part of your KYC process? | Yes |
| **68 a** | If Y, is this at: | |
| **68 a1** | Onboarding | Yes |
| **68 a2** | KYC renewal | No |
| **68 a3** | Trigger event | No |
| **68 a4** | Other | No |
| **68 a4a** | If yes, please specify "Other" | A site visit at onboarding is mandatory for the business unit Factoring & Lending |
| **69** | Does the Entity have a risk based approach to screening customers for Adverse Media/Negative News? | Yes |
| **69 a** | If Y, is this at: | |
| **69 a1** | Onboarding | Yes |
| **69 a2** | KYC renewal | Yes |

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| **69 a3** | Trigger event | Yes |
| **70** | What is the method used by the Entity to screen for Adverse Media/Negative News? | Combination of automated and manual |
| **71** | 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 |
| **71 a** | If Y, is this at: | |
| **71 a1** | Onboarding | Yes |
| **71 a2** | KYC renewal | Yes |
| **71 a3** | Trigger event | Yes |
| **72** | What is the method used by the Entity to screen PEPs? | Combination of automated and manual |
| **73** | 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 |
| **74** | Is KYC renewed at defined frequencies based on risk rating (Periodic Reviews)? | Yes |
| **74 a** | If yes, select all that apply: | |
| **74 a1** | Less than one year | No |
| **74 a2** | 1 – 2 years | Yes |
| **74 a3** | 3 – 4 years | Yes |
| **74 a4** | 5 years or more | Yes |
| **74 a5** | Trigger-based or perpetual monitoring reviews | Yes |
| **74 a6** | Other (Please specify) | |
| **75** | Does the Entity maintain and report metrics on current and past periodic or trigger event due diligence reviews? | Yes |
| **76** | 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? | |
| **76 a** | Arms, defence, military | EDD on risk-based approach |
| **76 b** | Respondent Banks | EDD on risk-based approach |
| **76 b1** | If EDD or restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022? | Yes |
| **76 c** | Embassies/Consulates | EDD on risk-based approach |
| **76 d** | Extractive industries | EDD on risk-based approach |
| **76 e** | Gambling customers | EDD on risk-based approach |
| **76 f** | General Trading Companies | EDD on risk-based approach |
| **76 g** | Marijuana-related Entities | Do not have this category of customer or industry |
| **76 h** | MSB/MVTS customers | EDD on risk-based approach |
| **76 i** | Non-account customers | EDD on risk-based approach |
| **76 j** | Non-Government Organisations | EDD on risk-based approach |
| **76 k** | Non-resident customers | EDD on risk-based approach |
| **76 l** | Nuclear power | Do not have this category of customer or industry |
| **76 m** | Payment Service Providers | EDD on risk-based approach |
| **76 n** | PEPs | EDD on risk-based approach |
| **76 o** | PEP Close Associates | EDD on risk-based approach |
| **76 p** | PEP Related | EDD on risk-based approach |
| **76 q** | Precious metals and stones | EDD on risk-based approach |
| **76 r** | Red light businesses/Adult entertainment | Do not have this category of customer or industry |
| **76 s** | Regulated charities | EDD on risk-based approach |
| **76 t** | Shell banks | Prohibited |
| **76 u** | Travel and Tour Companies | Do not have this category of customer or industry |
| **76 v** | Unregulated charities | Do not have this category of customer or industry |
| **76 w** | Used Car Dealers | Do not have this category of customer or industry |
| **76 x** | Virtual Asset Service Providers | EDD on risk-based approach |
| **76 y** | Other (specify) | |
| **77** | If restricted, provide details of the restriction | |
| **78** | Does EDD require senior business management and/or compliance approval? | Yes |

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| **78 a** | If Y indicate who provides the approval: | Both |
| **79** | Does the Entity have specific procedures for onboarding entities that handle client money such as lawyers, accountants, consultants, real estate agents? | No |
| **80** | Does the Entity perform an additional control or quality review on clients subject to EDD? | Yes |
| **81** | Confirm that all responses provided in the above Section are representative of all the LE's branches | Yes |
| **81 a** | If N, clarify which questions the difference/s relate to and the branch/es that this applies to | |
| **82** | If appropriate, provide any additional information/context to the answers in this section. | 78: Compliance issues an opinion and the final authorization is provided by the Senior Manager. |
| **8. MONITORING & REPORTING** | | |
| **83** | Does the Entity have risk based policies, procedures and monitoring processes for the identification and reporting of suspicious activity? | Yes |
| **84** | What is the method used by the Entity to monitor transactions for suspicious activities? | Combination of automated and manual |
| **84 a** | If manual or combination selected, specify what type of transactions are monitored manually | The transactions alerted by the transaction screening tools |
| **84 b** | If automated or combination selected, are internal system or vendor-sourced tools used? | Vendor-sourced tools |
| **84 b1** | If 'Vendor-sourced tool' or 'Both' selected, what is the name of the vendor/tool? | Netech, Transacton Screening, RSI Embargo, PSC Finwave, SIA/SMART GAFI, LSEG Refinitiv, Factiva Dow Jones |
| **84 b2** | When was the tool last updated? | < 1 year |
| **84 b3** | When was the automated Transaction Monitoring application last calibrated? | < 1 year |
| **85** | Does the Entity have regulatory requirements to report suspicious transactions? | Yes |
| **85 a** | If Y, does the Entity have policies, procedures and processes to comply with suspicious transaction reporting requirements? | Yes |
| **86** | Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity? | Yes |
| **87** | Does the Entity have a data quality management programme to ensure that complete data for all transactions are subject to monitoring? | Yes |
| **88** | Does the Entity have processes in place to respond to Request For Information (RFIs) from other entities in a timely manner? | Yes |
| **89** | Does the Entity have processes in place to send Requests for Information (RFIs) to their customers in a timely manner? | Yes |
| **90** | Confirm that all responses provided in the above Section are representative of all the LE's branches | Yes |
| **90 a** | If N, clarify which questions the difference/s relate to and the branch/es that this applies to | |
| **91** | If appropriate, provide any additional information/context to the answers in this section. | |
| **9. PAYMENT TRANSPARENCY** | | |
| **92** | Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards? | Yes |

| | | |
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| **93** | Does the Entity have policies, procedures and processes to comply with and have controls in place to ensure compliance with: | |
| **93 a** | FATF Recommendation 16 | Yes |
| **93 b** | Local Regulations | Yes |
| **93 b1** | If Y, specify the regulation | Regulation (EU) 2023/1113 - Legislative Decree 21 November 2007, n. 231 - Bank of Italy Regulations |
| **93 c** | If N, explain | |
| **94** | Does the Entity have controls to support the inclusion of required and accurate originator information in cross border payment messages? | Yes |
| **95** | Does the Entity have controls to support the inclusion of required beneficiary information cross-border payment messages? | Yes |
| **95 a** | If Y, does the Entity have procedures to include beneficiary address including country in cross border payments? | No |
| **96** | Confirm that all responses provided in the above Section are representative of all the LE's branches | Yes |
| **96 a** | If N, clarify which questions the difference/s relate to and the branch/es that this applies to. | |
| **97** | If appropriate, provide any additional information/context to the answers in this section. | |
| **10. SANCTIONS** | | |
| **98** | Does the Entity have a Sanctions Policy approved by management regarding compliance with sanctions law applicable to the Entity, including with respect to its business conducted with, or through accounts held at foreign financial institutions? | Yes |
| **99** | 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 |
| **100** | 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 |
| **101** | Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists? | Yes |
| **102** | What is the method used by the Entity for sanctions screening? | Automated |
| **102 a** | If 'automated' or 'both automated and manual' selected: | |
| **102 a1** | Are internal system of vendor-sourced tools used? | Vendor-sourced tools |
| **102 a1a** | If a 'vendor-sourced tool' or 'both' selected, what is the name of the vendor/tool? | LSEG Refinitiv, Factiva Dow Jones |
| **102 a2** | When did you last test the effectiveness (of finding true matches) and completeness (lack of missing data) of the matching configuration of the automated tool? (If 'Other' please explain in | 1-2 years |
| **103** | 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 |
| **104** | What is the method used by the Entity? | Automated |
| **105** | Does the Entity have a data quality management programme to ensure that complete data for all transactions are subject to sanctions screening? | Yes |
| **106** | Select the Sanctions Lists used by the Entity in its sanctions screening processes: | |
| **106 a** | Consolidated United Nations Security Council Sanctions List (UN) | Used for screening customers and beneficial owners and for filtering transactional data |
| **106 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 |
| **106 c** | Office of Financial Sanctions Implementation HMT (OFSI) | Used for screening customers and beneficial owners and for filtering transactional data |

| | | |
|---|---|---|
| **106 d** | European Union Consolidated List (EU) | Used for screening customers and beneficial owners and for filtering transactional data |
| **106 e** | Lists maintained by other G7 member countries | Used for screening customers and beneficial owners and for filtering transactional data |
| **106 f** | Other (specify) | |
| **107** | 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: | |
| **107 a** | Customer Data | Same day to 2 business days |
| **107 b** | Transactions | Same day to 2 business days |
| **108** | Does the Entity have a physical presence, e.g. branches, subsidiaries, or representative offices located in countries/regions against which UN, OFAC, OFSI, EU or G7 member countries have enacted comprehensive jurisdiction-based Sanctions? | No |
| **109** | Confirm that all responses provided in the above Section are representative of all the LE's branches | Yes |
| **109 a** | If N, clarify which questions the difference/s relate to and the branch/es that this applies to. | |
| **110** | If appropriate, provide any additional information/context to the answers in this section. | |
| **11. TRAINING & EDUCATION** | | |
| **111** | Does the Entity provide mandatory training, which includes: | |
| **111 a** | Identification and reporting of transactions to government authorities | Yes |
| **111 b** | Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered | Yes |
| **111 c** | Internal policies for controlling money laundering, terrorist financing and sanctions violations | Yes |
| **111 d** | New issues that occur in the market, e.g. significant regulatory actions or new regulations | Yes |
| **111 e** | Conduct and Culture | Yes |
| **111 f** | Fraud | No |
| **112** | Is the above mandatory training provided to : | |
| **112 a** | Board and Senior Committee Management | Yes |
| **112 b** | 1st Line of Defence | Yes |
| **112 c** | 2nd Line of Defence | Yes |
| **112 d** | 3rd Line of Defence | Yes |
| **112 e** | Third parties to which specific FCC activities have been outsourced | Not Applicable |
| **112 f** | Non-employed workers (contractors/consultants) | No |
| **113** | Does the Entity provide AML, CTF & Sanctions training that is targeted to specific roles, responsibilities and high risk products, services and activities? | Yes |
| **114** | Does the Entity provide customised training for AML, CTF and Sanctions staff? | Yes |
| **114 a** | If Y, how frequently is training delivered? | Annually |
| **115** | Confirm that all responses provided in the above Section are representative of all the LE's branches | Yes |

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| | | |
|---|---|---|
| **115 a** | If N, clarify which questions the difference/s relate to and the branch/es that this applies to. | |
| **116** | If appropriate, provide any additional information/context to the answers in this section. | |
| **12. QUALITY ASSURANCE /COMPLIANCE TESTING** | | |
| **117** | Does the Entity have a program wide risk based Quality Assurance programme for financial crime (separate from the independent Audit function)? | Yes |
| **118** | Does the Entity have a program wide risk based Compliance Testing process (separate from the independent Audit function)? | Yes |
| **119** | Confirm that all responses provided in the above Section are representative of all the LE's branches | Yes |
| **119 a** | If N, clarify which questions the difference/s relate to and the branch/es that this applies to. | |
| **120** | If appropriate, provide any additional information/context to the answers in this section. | |
| **13. AUDIT** | | |
| **121** | 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, ABC, Fraud and Sanctions policies and practices on a regular basis? | Yes |
| **122** | How often is the Entity audited on its AML, CTF, ABC, Fraud and Sanctions programme by the following: | |
| **122 a** | Internal Audit Department | Yearly |
| **122 b** | External Third Party | Component based reviews |
| **123** | Does the internal audit function or other independent third party cover the following areas: | |
| **123 a** | AML, CTF, ABC, Fraud and Sanctions policy and procedures | Yes |
| **123 b** | Enterprise Wide Risk Assessment | Yes |
| **123 c** | Governance | Yes |
| **123 d** | KYC/CDD/EDD and underlying methodologies | Yes |
| **123 e** | Name Screening & List Management | Yes |
| **123 f** | Reporting/Metrics & Management Information | Yes |
| **123 g** | Suspicious Activity Filing | Yes |
| **123 h** | Technology | Yes |
| **123 i** | Transaction Monitoring | Yes |
| **123 j** | Transaction Screening including for sanctions | Yes |
| **123 k** | Training & Education | Yes |
| **123 l** | Other (specify) | |
| **124** | Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness? | Yes |
| **125** | Confirm that all responses provided in the above section are representative of all the LE's branches | Yes |
| **125 a** | If N, clarify which questions the difference/s relate to and the branch/es that this applies to. | |
| **126** | If appropriate, provide any additional information/context to the answers in this section. | |
| **14. FRAUD** | | |
| **127** | Does the Entity have policies in place addressing fraud risk? | Yes |
| **128** | Does the Entity have a dedicated team responsible for preventing & detecting fraud? | No |

| | | |
|---|---|---|
| **129** | Does the Entity have real time monitoring to detect fraud? | Yes |
| **130** | Do the Entity's processes include gathering additional information to support its fraud controls, for example: IP address, GPS location, and/or device ID? | No |
| **131** | Confirm that all responses provided in the above section are representative of all the LE's branches | Yes |
| **131 a** | If N, clarify which questions the difference/s relate to and the branch/es that this applies to. | |
| **132** | If appropriate, provide any additional information/context to the answers in this section. | 129: Yes, for payments business |

## Declaration Statement

Wolfsberg Group Correspondent Banking Due Diligence Questionnaire 2023 (CBDDQ V1.4)
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)

BFF Bank S.p.A. (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 this Wolfsberg CBDDQ will be kept current and will be updated no less frequently than every eighteen months.

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

I, Enrico Tadiotto (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, Daniele Di Febo (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) 8th October 2026

_____ (Signature & Date) 8th October 2026