



MEDIOBANCA

SUMMARY OF MEDIOBANCA GROUP POLICY FOR MANAGING MONEY LAUNDERING AND TERRORIST FINANCING RISK

DECEMBER 2019



General principles for managing the money laundering and terrorist financing risk of Mediobanca Group

To ensure a proper compliance with AML/CTF regulations, Mediobanca Group's acts in accordance with the following principles:

- ◆ prohibition of establishing accounts, relationships or operations with “shell banks” (banks or entities engaged in equivalent activities incorporated and authorised to perform their activities in a jurisdiction in which they have no physical presence, and are not affiliated with a regulated financial group) or fiduciary companies, trusts, limited public companies or bearer-share owned companies based in one of the high-risk third countries of the European Commission list. Such measures also apply to other legal entities otherwise named, and incorporated in the above countries, for which it is not possible to identify the beneficial owner or check its identity;
- ◆ prohibition of establishing relationships with parties convicted (also in case of no final judgement) for certain specific serious offences;
- ◆ prohibition of establishing relationships with parties resident or which mainly perform their activities in countries under total embargos;
- ◆ prohibition of executing transactions involving parties included in the applicable national or international anti-terrorism black lists (e.g. EU regulations, United Nations resolutions) on whatever grounds involved;
- ◆ must be provided name detection measures when establishing the business relationship and on an ongoing basis for all relevant parties (customers, representatives, beneficial owners) with which the Group enters into relationship, directly or indirectly, based on consultation of the main national and international checklists of names, in accordance with the best sector practices;
- ◆ transaction monitoring instruments able to detect any irregular behaviour in customer transactions, and payments screening processes to detect whether transfer instructions include any parties (payer/ payee) and/or countries (of origin/ destination) included in the international black lists;
- ◆ customer profiling processes, both internal to the individual companies and within the Group, aimed at assigning each customer an ML/TF risk level based on both subjective information (e.g. personal data, adverse news) and objective data (e.g. reporting of suspicious transactions);
- ◆ application of enhanced measures in cases of a higher ML/TF risk – whether mandatorily required by the applicable regulations (e.g. occasional relations/ transactions which involve high-risk countries) or the result of the customer profiling model internally adopted – including specific internal authorization processes and ongoing enhanced due diligence measures;
- ◆ in cases involving natural persons who are or who have been entrusted with prominent functions (“politically exposed persons”, or “PEPs”):
 - assigns a high money laundering risk profile;
 - adopts enhanced due diligence procedures to collect and assess information related to the origin of the funds, sources of wealth, asset situation and relevant business affairs;



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- ensures an ongoing due diligence model based on enhanced forms of regular behavioural monitoring;
- ◆ harmonisation of certain elements of the ML/TF risk assessment at Group level (e.g. grey/ black list countries, use of the same name-detection databases, adoption of common operating guidelines);
- ◆ adoption of a Customer Group Registry, to ensure the harmonisation of ML/TF risk for common customers. This will include:
 - sharing at a consolidated level – without prejudice to applicable local legislation– of all relevant ML/TF data in order to prevent conducts involving money laundering, including news of any suspicious transactions that have been reported;
 - assigning the same risk profile to common customers between more than one Group company¹; this profile will be the highest of the profiles assigned by the different companies to the same customer;
- ◆ requesting on a risk-based approach, specific declarations from the customer on the fulfilment of their tax obligations²;
- ◆ adopting a Group methodology for periodic self-assessment of the ML/TF risk to which each Group company is exposed, in accordance with the methodologies and criteria set by the Bank of Italy;
- ◆ foreseeing periodical and episodic information flows, qualitative and quantitative, reporting in order to inform the corporate bodies and control functions (including those of the Parent Company) of any relevant events that could impact on the exposure to ML/TF risk;
- ◆ providing ongoing training programmes for employees and external collaborators, with the active and ongoing involvement of the AML function;
- ◆ providing mechanisms for ongoing and prior involvement of the AML function in the companies' innovation processes, in order to detect the specific risks inherent in every initiative and propose adequate mitigation measures.

¹ The foregoing shall be without prejudice to any confidentiality restrictions on the circulation of information under the applicable local regulations.

² For example, in case of funds originated from countries with preferential tax regimes.