

Name: Intesa Sanpaolo Bank Ireland plc

Location: Dublin, Ireland

Anti-Money Laundering Questionnaire

If you answer "no" to any question, additional information can be supplied at the end of the questionnaire.

I. General AML Policies, Practices and Procedures:	Yes	No
1. Is the AML compliance program approved by the board or a senior committee?	Y	
2. Does the company have a legal and regulatory compliance program that includes a designated officer that is responsible for coordinating and overseeing the AML framework?	Y	
3. Has the company developed written policies documenting the processes that they have in place to prevent, detect and report suspicious transactions?	Y	
4. In addition to inspections by the government supervisors/regulators, does the company have an internal audit function or other independent third party that assesses AML policies and practices on a regular basis?	Y	
5. Does the company have a policy prohibiting accounts/relationships with shell banks? (<i>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.</i>)	Y	
6. Does the company 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?	Y	
7. Does the company have policies covering relationships with Politically Exposed Persons (PEP's), their family and close associates?	Y	
8. Does the company have record retention procedures that comply with applicable law?	Y	
9. Are the company's AML policies and practices being applied to all branches and subsidiaries of the company both in the home country and in locations outside of that jurisdiction?	N/A	
II. Risk Assessment	Yes	No
10. Does the company have a risk-based assessment of its customer base and their transactions?	Y	
11. Does the company determine the appropriate level of enhanced due diligence necessary for those categories of customers and transactions that the company has reason to believe pose a heightened risk of illicit activities at or through the company?	Y	
III. Know Your Customer, Due Diligence and Enhanced Due Diligence	Yes	No
12. Has the company implemented processes for the identification of those customers on whose behalf it maintains or operates accounts or conducts transactions?	Y	

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13. Does the company have a requirement to collect information regarding its customers' business activities?	Y	
14. Does the company assess its customers' AML policies or practices?	Y	
15. Does the company have a process to review and, where appropriate, update customer information relating to high risk client information?	Y	
16. Does the company have procedures to establish a record for each new customer noting their respective identification documents and 'Know Your Customer' information?	Y	
17. Does the company complete a risk-based assessment to understand the normal and expected transactions of its customers?	Y	
IV. Reportable Transactions and Prevention and Detection of Transactions with Illegally Obtained Funds	Yes	No
18. Does the company have policies or practices for the identification and reporting of transactions that are required to be reported to the authorities?	Y	
19. Where cash transaction reporting is mandatory, does the company have procedures to identify transactions structured to avoid such obligations?	N/A	
20. Does the company screen customers and transactions against lists of persons, entities or countries issued by government/competent authorities?	Y	
21. Does the company have policies to reasonably ensure that it only operates with correspondent banks that possess licenses to operate in their countries of origin?	Y	
22. Does the FI adhere to the Wolfsberg Transparency Principles and the appropriate usage of the SWIFT MT 202/202COV and MT 205/205COV message formats? ¹		

¹ 1 The four payment message standards to be observed are: i) FIs should not omit, delete, or alter information in payment messages or orders for the purpose of avoiding detection of that information by any other FI in the payment process; ii) FIs should not use any particular payment message for the purpose of avoiding detection of information by any other FI in the payment process; iii) Subject to applicable laws, FIs should cooperate as fully as practicable with other FIs in the payment process when requesting to provide information about the parties involved; and (iv) FIs should strongly encourage their correspondent banks to observe these principles. Source: [http://www.wolfsberg-principles.com/pdf/standards/Wolfsberg_NYCH_Statement_on_Payment_Message_Standards_\(2007\).pdf](http://www.wolfsberg-principles.com/pdf/standards/Wolfsberg_NYCH_Statement_on_Payment_Message_Standards_(2007).pdf)

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V. Transaction Monitoring	Yes	No
23. Does the company have a monitoring program for unusual and potentially suspicious activity that covers funds transfers and monetary instruments such as travelers checks, money orders, etc?	Y	
VI. AML Training	Yes	No
24. Does the company provide AML training to relevant employees that includes: <ul style="list-style-type: none"> ▪ Identification and reporting of transactions that must be reported to government authorities. ▪ Examples of different forms of money laundering involving the company's products and services. ▪ Internal policies to prevent money laundering. 	Y	
25. Does the company retain records of its training sessions including attendance records and relevant training materials used?	Y	
26. Does the company communicate new AML related laws or changes to existing AML related policies or practices to relevant employees?	Y	
27. Does the company employ third parties to carry out some of the functions of the company?		N
28. If the answer to question 26 is yes, does the company provide AML training to relevant third parties that includes: <ul style="list-style-type: none"> • Identification and reporting of transactions that must be reported to government authorities. • Examples of different forms of money laundering involving the FI's products and services. • Internal policies to prevent money laundering. 		

Space for additional information:

(Please indicate which question the information is referring to.)

Q 27 – Intesa Sanpaolo Bank Ireland plc does not employ third parties to carry out AML activities

Name: Gemma Lacy
Title: Compliance Manager & MLRO
Signature: 
Date: 22 nd March 2016

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