

CREDITO VALTELLINESE S.C.

Piazza Quadrivio No. 8 – 23100 SONDRIO (ITALY)

Anti-Money Laundering Questionnaire

1. Does the AML compliance program require approval of the FI's Board or a senior committee thereof?	Yes	
2. Does the FI have a legal and regulatory compliance program that includes a designated Compliance officer that is responsible for coordinating and overseeing the AML program on a day-to-day basis, which has been approved by senior management of the FI?	Yes	
3. Has the FI developed written policies documenting the processes that they have in place to prevent, detect and report suspicious transactions that has been approved by senior management?	Yes	
4. In addition to inspections by the government supervisors/regulators, does the FI client have an in house audit function or other independent third party that assesses AML policies and practices on a regular basis?	Yes	
5. Does the FI 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>)	Yes	
6. Does the FI have policies covering relationships with Politically Exposed Persons (PEP's), their family and close associates consistent with industry best practices?	Yes	
7. Does the FI have appropriate record retention procedures pursuant to applicable law?	Yes	
8. Does the FI require that its AML policies and practices be applied to all branches and subsidiaries of the FI in the home country as well as in locations outside of the home country?	Yes	
9. Does the FI have a risk focused assessment of its customer base and transactions of its customers?	Yes	
10. 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 at or through the FI?	Yes	
11. Has the FI implemented systems for the identification of its customers, including customer information in the case of recorded transactions, account opening, etc. (<i>for example: name, nationality, street address, telephone number, occupation, age/date of birth, number and type of valid official identification, as well as the name of the country/state that issued it?</i>)	Yes	

12. Does the FI have a requirement to collect information regarding its customers' business activities?	Yes	
13. Does the FI collect information and assess its FI customers' AML policies or practices?	Yes	
14. Does the FI have procedures to establish a record for each customer noting their respective identification documents and 'Know Your Customer' information collected at account opening?	Yes	
15. Does the FI take steps to understand the normal and expected transactions of its customers based on its risk assessment of its customers?	Yes	
16. Does the FI have policies or practices for the identification and reporting of transactions that are required to be reported to the authorities?	Yes	
17. Does the FI have procedures to identify transactions structured to avoid large cash reporting requirements?	Yes	
18. Does the FI screen transactions for customers or transactions the FI deems to be of significantly high risk (which may include persons, entities or countries that are contained on lists issued by government/international bodies) that special attention to such customers or transactions is necessary prior to completing any such transactions?	Yes	
19. 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? (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	
20. 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	
21. Does the FI have a monitoring program for suspicious or unusual activity that covers funds transfers and monetary instruments (such as traveler's checks, money orders, etc)?	Yes	
22. Does the FI provide AML 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 involving the FI's products and services and in house policies to prevent money laundering?	Yes	
23. Does the FI retain records of its training sessions including attendance records and relevant training materials used?	Yes	
24. Does the FI have policies to communicate new AML related laws or changes to existing AML related policies or practices to relevant employees?	Yes	
25. Does the FI employ agents to carry out some of the functions of the FI and if so does the FI provide AML training to relevant agents that includes 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 and in house policies to prevent money laundering?		No

Additional Information

Compliance Officer:

Mr EDOARDO MARCHESI

COMPLIANCE MANAGER

DIREZIONE COMPLIANCE – DELTAS SOC. CONS. P.A.

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Credito Valtellinese S.C.

General Manager

Miro Fiordi

Signature:

A handwritten signature in black ink, appearing to read 'Miro Fiordi', written in a cursive style.

Sondrio, 31 agosto 2011