

**the  
Wolfsberg  
Group**

Financial Institution Name:

Banka Intesa Sanpaolo d.d.

Location (Country):

Slovenia

No #	Question	Answer
<b>1: ENTITY &amp; OWNERSHIP</b>		
1	Full Legal Name	Banka Intesa Sanpaolo d.d.
2	Append a list of branches which are covered by this questionnaire	We have regional branches in Slovenia and are all covered by this questionnaire (See Appendix 1)
3	Full Legal (Registered) Address	Pristaniška Ulica 14, 6502 Koper, Slovenia
4	Full Primary Business Address (if different from above)	
5	Date of Entity incorporation / establishment	1955
6	Select type of ownership and append an ownership chart if available	
6 a	Publicly Traded (25% of shares publicly traded)	No
6 a1	If Y, indicate the exchange traded on and ticker symbol	
6 b	Member Owned / Mutual	No
6 c	Government or State Owned by 25% or more	No
6 d	Privately Owned	Yes
6 d1	If Y, provide details of shareholders or ultimate beneficial owners with a holding of 10% or more	Privredna banka Zagreb d.d., Zagreb, Croatia, 51% Intesa Sanpaolo SpA, Milan, Italy, 48.10%
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	

2. AML, CTF & SANCTIONS PROGRAMME		
9	Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:	
9 a	Appointed Officer with sufficient experience / expertise	Yes
9 b	Cash Reporting	Yes
9 c	CDD	Yes
9 d	EDD	Yes
9 e	Beneficial Ownership	Yes
9 f	Independent Testing	Yes
9 g	Periodic Review	Yes
9 h	Policies and Procedures	Yes
9 i	Risk Assessment	Yes
9 j	Sanctions	Yes
9 k	PEP Screening	Yes
9 l	Adverse Information Screening	Yes
9 m	Suspicious Activity Reporting	Yes
9 n	Training and Education	Yes
9 o	Transaction Monitoring	Yes
10	Is the Entity's AML, CTF & Sanctions policy approved at least annually by the Board or equivalent Senior Management Committee?	No
11	Does the Entity use third parties to carry out any components of its AML, CTF & Sanctions programme?	No
11a	If Y, provide further details	
3. ANTI BRIBERY & CORRUPTION		
12	Has the Entity documented policies and procedures consistent with applicable ABC regulations and requirements to [reasonably] prevent, detect and report bribery and corruption?	Yes
13	Does the Entity's internal audit function or other independent third party cover ABC Policies and Procedures?	Yes
14	Does the Entity provide mandatory ABC training to:	Yes
14 a	Board and Senior Committee Management	Yes
14 b	1st Line of Defence	Yes
14 c	2nd Line of Defence	Yes
14 d	3rd Line of Defence	Yes
14 e	3rd parties to which specific compliance activities subject to ABC risk have been outsourced	No
14 f	Non-employed workers as appropriate (contractors / consultants)	No

4. POLICIES & PROCEDURES		
15	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report:	
15 a	Money laundering	Yes
15 b	Terrorist financing	Yes
15 c	Sanctions violations	Yes
16	Does the Entity have policies and procedures that:	
16 a	Prohibit the opening and keeping of anonymous and fictitious named accounts	Yes
16 b	Prohibit the opening and keeping of accounts for unlicensed banks and / or NBFIs	Yes
16 c	Prohibit dealing with other entities that provide banking services to unlicensed banks	Yes
16 d	Prohibit accounts / relationships with shell banks	Yes
16 e	Prohibit dealing with another Entity that provides services to shell banks	Yes
16 f	Prohibit opening and keeping of accounts for Section 311 designated entities	Yes
16 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
16 h	Assess the risks of relationships with PEPs, including their family and close associates	Yes
16 i	Define escalation processes for financial crime risk issues	Yes
16 j	Specify how potentially suspicious activity identified by employees is to be escalated and investigated	Yes
16 k	Outline the processes regarding screening for sanctions, PEPs and negative media	Yes
17	Has the Entity defined a risk tolerance statement or similar document which defines a risk boundary around their business?	Yes
18	Does the Entity have a record retention procedures that comply with applicable laws?	Yes
18 a	If Y, what is the retention period?	5 years or more

5. KYC, CDD and EDD		
19	Does the Entity verify the identity of the customer?	Yes
20	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
21	Which of the following does the Entity gather and retain when conducting CDD? Select all that apply:	
21 a	Ownership structure	Yes
21 b	Customer identification	Yes
21 c	Expected activity	Yes
21 d	Nature of business / employment	Yes
21 e	Product usage	Yes
21 f	Purpose and nature of relationship	Yes
21 g	Source of funds	Yes
21 h	Source of wealth	Yes
22	Are each of the following identified:	
22 a	Ultimate beneficial ownership	Yes
22 a1	Are ultimate beneficial owners verified?	Yes
22 b	Authorised signatories (where applicable)	Yes
22 c	Key controllers	Yes
22 d	Other relevant parties	
23	Does the due diligence process result in customers receiving a risk classification?	Yes
24	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
25	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
26	Does the Entity have a process to review and update customer information based on:	
26 a	KYC renewal	Yes
26 b	Trigger event	Yes
27	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?	
27 a	Non-account customers	EDD on a risk based approach
27 b	Offshore customers	EDD & Restricted on a risk based approach

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27 c	Shell banks	Prohibited
27 d	MVTS/ MSB customers	Prohibited
27 e	PEPs	EDD on a risk based approach
27 f	PEP Related	EDD on a risk based approach
27 g	PEP Close Associate	EDD on a risk based approach
27 h	Correspondent Banks	EDD on a risk based approach
27 h1	If EDD or EDD & Restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2014?	Yes
27 i	Arms, defense, military	EDD & Restricted on a risk based approach
27 j	Atomic power	EDD & Restricted on a risk based approach
27 k	Extractive industries	EDD & Restricted on a risk based approach
27 l	Precious metals and stones	EDD & Restricted on a risk based approach
27 m	Unregulated charities	EDD & Restricted on a risk based approach
27 n	Regulated charities	EDD & Restricted on a risk based approach
27 o	Red light business / Adult entertainment	Prohibited
27 p	Non-Government Organisations	EDD & Restricted on a risk based approach
27 q	Virtual currencies	EDD & Restricted on a risk based approach
27 r	Marijuana	Prohibited
27 s	Embassies / Consulates	EDD on a risk based approach
27 t	Gambling	EDD & Restricted on a risk based approach
27 u	Payment Service Provider	Prohibited
27 v	Other (specify)	
28	If restricted, provide details of the restriction	

6. MONITORING & REPORTING		
29	Does the Entity have risk based policies, procedures and monitoring processes for the identification and reporting of suspicious activity?	Yes
30	What is the method used by the Entity to monitor transactions for suspicious activities?	
30 a	Automated	Yes
30 b	Manual	Yes
30 c	Combination of automated and manual	Yes
31	Does the Entity have regulatory requirements to report currency transactions?	Yes
31 a	If Y, does the Entity have policies, procedures and processes to comply with currency reporting requirements?	Yes
32	Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity?	Yes
7. PAYMENT TRANSPARENCY		
33	Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards?	Yes
34	Does the Entity have policies, procedures and processes to [reasonably] comply with and have controls in place to ensure compliance with:	
34 a	FATF Recommendation 16	Yes
34 b	Local Regulations	Yes
34 b1	Specify the regulation	Zakon o preprečevanju pranja denarja (ZPPDFT-1); Prevention of money laundry and terrorism financing act (based on and in-line with 4th AML Directive)
34 c	If N, explain	

8. SANCTIONS		
35	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
36	Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists?	Yes
37	Select the Sanctions Lists used by the Entity in its sanctions screening processes:	
37 a	Consolidated United Nations Security Council Sanctions List (UN)	Used for screening customers and beneficial owners and for filtering transactional data
37 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
37 c	Office of Financial Sanctions Implementation HMT (OFSI)	Used for screening customers and beneficial owners (i.e. reference data)
37 d	European Union Consolidated List (EU)	Used for screening customers and beneficial owners and for filtering transactional data
37 e	Other (specify)	
38	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
9. TRAINING & EDUCATION		
39	Does the Entity provide mandatory training, which includes :	
39 a	Identification and reporting of transactions to government authorities	Yes
39 b	Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered	Yes
39 c	Internal policies for controlling money laundering, terrorist financing and sanctions violations	Yes
39 d	New issues that occur in the market, e.g., significant regulatory actions or new regulations	Yes
40	Is the above mandatory training provided to :	Yes
40 a	Board and Senior Committee Management	Yes
40 b	1st Line of Defence	Yes
40 c	2nd Line of Defence	Yes
40 d	3rd Line of Defence	Yes
40 e	3rd parties to which specific FCC activities have been outsourced	No
40 f	Non-employed workers (contractors / consultants)	No
10. AUDIT		
41	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

**APPENDIX 1: List of Banka Intesa Sanpaolo d.d. branches covered by the Wolfsberg Questionnaire (question 2)**

Poslovalnica / Business Unit Koper  
Poslovalnica / Business Unit Markovec  
Poslovalnica / Business Unit Olmo  
Poslovalnica / Business Unit Ankaran  
Poslovalnica / Business Unit Izola  
Poslovalnica / Business Unit Lucija  
Poslovalnica / Business Unit Piran  
Poslovalnica / Business Unit Sežana  
Poslovalnica / Business Unit Komen  
Poslovalnica / Business Unit Kozina  
Poslovalnica / Business Unit Divača  
Poslovalnica / Business Unit Postojna  
Poslovalnica / Business Unit Pivka  
Poslovalnica / Business Unit Ilirska Bistrica  
Poslovalnica / Business Unit Trnovo  
Poslovalnica / Business Unit Podgrad  
Poslovalnica / Business Unit Maribor  
Poslovalnica / Business Unit Ptuj  
Poslovalnica / Business Unit Lenart  
Poslovalnica / Business Unit Ormož  
Poslovalnica / Business Unit Miklavž  
Poslovalnica / Business Unit Slovenska Bistrica  
Poslovalnica / Business Unit Nova Gorica  
Poslovalnica / Business Unit Idrija  
Poslovalnica / Business Unit Tolmin  
Poslovalnica / Business Unit Ajdovščina  
Poslovalnica / Business Unit Slovenska  
Poslovalnica / Business Unit Dunajska  
Poslovalnica / Business Unit Ljubljana center  
Poslovalnica / Business Unit Trzin  
Poslovalnica / Business Unit Kamnik  
Poslovalnica / Business Unit Logatec  
Poslovalnica / Business Unit Brdo  
Poslovalnica / Business Unit Grosuplje  
Poslovalnica / Business Unit Kočevje  
Poslovalnica / Business Unit Novo mesto  
Poslovalnica / Business Unit Trebnje  
Poslovalnica / Business Unit Sevnica  
Poslovalnica / Business Unit Črnomelj  
Poslovalnica / Business Unit Brežice  
Poslovalnica / Business Unit Kranj  
Poslovalnica / Business Unit Radovljica  
Poslovalnica / Business Unit Jesenice  
Poslovalnica / Business Unit Globus  
Poslovalnica / Business Unit Murska Sobota  
Poslovalnica / Business Unit Celje  
Poslovalnica / Business Unit Velenje  
Poslovalnica / Business Unit Šentjur  
Poslovalnica / Business Unit Slovenj Gradec  
Poslovalnica / Business Unit Radlje ob Dravi  
Poslovalnica / Business Unit Ravne na Koroškem