



CASSA DI RISPARMIO  
DI SAN MINIATO  
S.p.A.

## ANTI-MONEY LAUNDERING QUESTIONNAIRE

### Financial Institution's data

Name, address and website address	<b>CASSA DI RISPARMIO DI SAN MINIATO S.P.A.</b> Via IV Novembre, 45 I - 56028 San Miniato (PI) - ITALY <a href="http://www.carismi.it">www.carismi.it</a>
---	--

### General contact information

Name	<b>Raffaele PAPA</b>	<b>Laura MELAI</b>
Title	Head, International Department	Assistant, International Department
Telephone	+39 0571 404727	+39 0571 404579
Fax	+39 0571 404555	+39 0571 404555
E-mail address	<a href="mailto:r.papa@crsm.it">r.papa@crsm.it</a>	<a href="mailto:l.melai@crsm.it">l.melai@crsm.it</a>

### Officer responsible for our Institution's AML program

Name	<b>Lucia CALVOSA</b>
Title	Chairman of the Board
Mailing address	Via IV Novembre, 45 I - 56028 San Miniato (PI) - ITALY
E-mail address	<a href="mailto:l.calvosa@crsm.it">l.calvosa@crsm.it</a>

### General information

a.	Does the FI comply with FAFT Recommendations?	<b>YES</b>
b.	Does the FI issue USA Patriot Act?	<b>YES</b>
c.	Is the FI regulated, supervised or licensed by a central bank or regulatory authority of the jurisdiction where the HO is based?	<b>YES</b> by <b>BANCA D'ITALIA - ROMA</b> (Italian central bank)
d.	Does the FI have an offshore licence or branches abroad?	<b>NO</b>



CASSA DI RISPARMIO  
DI SAN MINIATO  
— S.p.A. —

<b>I. General AML policies, practices and procedures</b>		
1.	Is the AML compliance program approved by the FI's board or a senior committee?	<b>YES</b>
2.	Does the FI have a legal and regulatory compliance program that includes a designated officer that is responsible for coordinating and overseeing the AML framework?	<b>YES</b>
3.	Has the FI developed written policies documenting the processes that they have in place to prevent, detect and report suspicious transactions?	<b>YES</b>
4.	In addition to inspections by the government supervisors/regulators, does the FI have an internal audit function or other independent third party that assesses AML policies and practices on a regular basis?	<b>YES</b>
5.	Does the FI have a policy prohibiting accounts/relationships with shell banks ? (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)	<b>YES</b>
6.	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?	<b>YES</b>
7.	Does the FI have policies covering relationships with politically exposed persons (PEP's), their family and close associates?	<b>YES</b>
8.	Does the FI have record retention procedures that comply with applicable law?	<b>YES</b>
9.	Are the FI's AML policies and practices being applied to all branches and subsidiaries of the FI both in the home country and in locations outside of that jurisdiction?	<b>YES</b>

<b>II. Risk Assessment</b>		
10.	Does the FI have a risk-based assessment of its customer base and their transactions?	<b>YES</b>
11.	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?	<b>YES</b>

<b>III. Know your customer, due diligence and enhanced due diligence</b>		
12.	Has the FI implemented processes for the identification of those customers on whose behalf it maintains or operates accounts or conducts transactions?	<b>YES</b>
13.	Does the FI have a requirement to collect information regarding its customers' business activities?	<b>YES</b>
14.	Does the FI assess its FI customers' AML policies and practices?	<b>YES</b>





CASSA DI RISPARMIO  
DI SAN MINIATO  
S.p.A.

15.	Does the FI have a process to review and, where appropriate, update customer information relating to high risk client information?	YES
16.	Does the FI have procedures to establish a record for each new customer noting their respective identification documents and "Know Your Customer" information?	YES
17.	Does the FI complete a risk-based assessment to understand the normal and expected transactions of its customers?	YES

#### IV. Reportable transactions and prevention and detection of transactions with illegally obtained funds

18.	Does the FI have policies or practices for the identification and reporting of transactions that are required to be reported to the authorities?	YES
19.	Where cash transaction reporting is mandatory, does the FI have procedures to identify transactions structured to avoid such obligations?	YES
20.	Does the FI screen customers and transactions against lists of persons, entities or countries issued by government/competent authorities?	YES
21.	Does the FI have policies to reasonably ensure that it only operates with correspondent banks that possess licences to operate in their countries of origin?	YES

#### V. Transaction monitoring

22.	Does the FI have a monitoring program for unusual and potentially suspicious activity that covers funds transfers and monetary instruments such as travelers checks, money orders, etc.?	YES
-----	--	-----

#### VI. AML training

23.	Does the FI provide AML training to relevant employees that includes: <ul style="list-style-type: none"><li>▪ identification and reporting of transactions that must be reported to government authorities;</li><li>▪ examples of different forms of money laundering involving the FI's products and services;</li><li>▪ internal policies to prevent money laundering?</li></ul>	YES
24.	Does the FI retain records of its training sessions including attendance records and relevant training materials used?	YES





CASSA DI RISPARMIO  
DI SAN MINIATO  
S.p.A.

25.	Does the FI communicate new AML related laws or changes to existing AML related policies or practices to relevant employees?	YES
26.	Does the FI employ third parties to carry out some of the functions of the FI?	YES
27.	If the answer to question 26 is "yes", does the FI provide AML training to the relevant third parties that includes: <ul style="list-style-type: none"><li>▪ identification and reporting of transactions that must be reported to the government authorities;</li><li>▪ examples of different forms of money laundering involving the FI's products and services;</li><li>▪ internal policies to prevent money laundering?</li></ul>	NO

**Space for additional information**

*(please indicate which question the information is referring to)*

Question 26 : only third parties that are subject to the same AML laws we comply with

Name	Lucia CALVOSA
Title	Chairman of the Board
Signature	
Date	25th day of September, 2008

