

Annex 3 b - CUSTOMER DUE DILIGENCE QUESTIONNAIRE -

NPL

Legal Entity

Dear Investor,

to comply with the AML duties requested by the Legislative Decree No. 231 dated 21 November 2007, as subsequently amended and supplemented, on prevention of the use of the financial systems for the purpose of laundering the proceeds from criminal activities and terrorist financing, we ask you to fill in the following questionnaire.

The above-mentioned implementing legislation requires, to have a complete identification and an adequate knowledge of the client and the eventual Beneficial Owner¹, to gather further information to those requested during the on-boarding phase, even for the acquired customers.

The legislation demands the client² to provide, under its own responsibility, all the information required and update to allow the Bank to meet its customer due diligence obligations. It provides specific sanctions in the case that the information is not provided or false.

As dictated by article 42 of the Legislative Degree 231/2007 and in the case that it is not possible to comply with the customer due diligence duties, the Bank cannot proceed to open a relation, to execute an operation, and it is necessary to end the already established relations. The same obligation is expected in the case of on-going business relations or operations in which fiduciary trust, companies, anonymous companies, or companies controlled through bearer shares and located in high-risk third countries take part, directly or indirectly.

The information provided will be also used by the Bank to comply with the legislation on Banking transparency governed by Title VI of the Legislative Decree 385/1993 and the related implementing dispositions, that lay down, the informative obligations for the banks, differentiated into clients' categories.

The Questionnaire is composed of 5 sections:

- **SECTION A**: identification details of the Legal Entity counterparty of the relation or the operation put in place with Guber Banca S.p.A.;
- **SECTION B**: identification details of the Natural Person (Executor) who is appointed to act in the name and on behalf of the Person at Section A;
- SECTION C: identification details of the Beneficial Owner/s of the Person at Section A;
- **SECTION D**: details of the relation or the operation put in place;
- SECTION E: section to be filled by Guber Banca S.p.A.;

Information on the Processing of Personal Data

The above information is provided to the customer, and, through him, to any beneficial owner, also in accordance with the privacy legislation (see EU Regulation 2016/679). We also inform that the provision of personal data for the identification of the interested party and for the completion of this questionnaire is mandatory by law and, in the event of their failure to issue, the Bank will not be able to proceed to establish or continue the relationship as well as to execute the requested operation and will have to evaluate whether to report to the UIF at the Bank of Italy. The data of the interested party may also be processed with computerized procedures for the following purposes: 1) identify the money laundering risk profile associated with customers and with the operations carried out by the same, in order to adapt the verification activities required by the law; 2) identify the category to which the customer belongs, in order to adapt the disclosure obligations imposed on the Bank by the legislation on banking transparency. The Bank, if it holds the title of "third party" pursuant to art. referred to in Section III, Chapter I, Title II, of the legislative decree n. 231/2007 and subsequent amendments and additions, may transmit the information contained in this questionnaire as well as the necessary copies of the identification and verification data and any other relevant document concerning the identity of the customer or of the beneficial owner/s. For the contact details of the data protection officer, and for any other information on the use of the data (also in relation to storage times) and on the rights of the interested party (Chapter III of EU Regulation 679/2016), please consult the more detailed information provided by the Bank and available on our website. Therefore, please refer to this document and forward it to the beneficial owner, if applicable.

¹ Pursuant to art. 1, comma 2, lett.pp), of Lgs. Decree 231/2007 and successive amendments, the beneficial owner is: the natural person/s, other than the client, in the interest of whom, the ongoing business relation is established, the professional performance is rendered, or the operation is executed.

² In the footnotes are indicated the laws related to the duties and responsibilities of the client (see artt. 22 e 55, comma 3).



For the purpose of completeness of the information here under, and in relation to the penal sanctions as in the Legislative Decree 231/2007 and subsequent amendments, we invite the Investors to inspect the information provided in footnotes in the present questionnaire.

Section A

	Identification de	etails of the Client	
Company Name			
Tax Code / VAT Number $_$	_ _ _ _ .	_ _ _ _ _	_1
Registered office			
City	Region Z	ZIP Code Co	untry
Domicile (fill in only if differe	ent from the Registered office)		
City	Region ZIP Cod	le Country.	
Telephone Number	En	nail	
1. Legal Nature	Other Information abo	out the Client Comp	any
Joint-stock	Partnership	Limited	General Simple
Company	Limited by share	Liability Company	Partnership Partnership
	Temporary	l F	
Cooperative	Association of	Enterprise	Other legal entity
	Companies (ATI)		
2. Economic Activity Carried	out:	<u> </u>	
		□ .	
Agriculture, sylviculture and fishing	Antique trade	Compulsory Insuran	
Activities of			
accommodation and catering services	Securitization activities	Buildin managen	<u> </u>
catering services		D D Court	
Real Estate activities	Manufacturing activities	Professio scientific	and Gambling houses
		technical ac	tivities
Auction houses/Art galleries	Civil Arms trade	Military arms	Ferrous and non-ferrous metals trade
galleries			metals trade
Trade, repair of vehicles and	Gold Shop/Jewellery	Defend	e Construction
motorcycles	trade	Defend	Construction
	Supply of electricity,	Gas supp	oly.
Mineral extraction	gas, steam and air conditioning	sewerage s	
		Rental, trav	el and
Education	Money Transfer	business su agencie	ipport Extraterritorial organization
	Production of goods		
Renewable energy production	and services for own use	Public Administra	I I Health and social assistance
	L use		
Information and communication	Currency exchange service	Compan involved in	waste Transport and warehousing
services		managen	nent
Virtual Asset	Others (please		
	describe)		



3. Annual turnover or Total Fin		4. Number of employees
	€	
5. RAE	6. SAE 7. ATE	co
8. Economic activities characterize of cash money	zed by high cash flows and/or the use	YES NO
9. Economic activities characteriz	zed by public funds	YES NO
10. Main place of business		
North of Italy	Centre of South of Italy	Italy Abroad
11. Listed company	YES NO	
12. Registration Number at the	c Company Register	
13. <u>Pending Processes</u>		
Tax Processes	YES (specify)	
	NO	
Criminal Processes	YES (specify)	
	NO	
Administrative Processes	YES (specify)	
	NO NO	
14. <u>Past Processes that have b</u>	ecome final with condemnation	
Tax Processes	YES (specify)	
	NO	
Criminal Processes	YES (specify)	
	NO NO	
Administrative Processes	YES (specify)	
	NO	



Section B

	Identification deta	ails of the Executor ³		
	(N.B attach a copy of the	ne Identification Docu	iment)	
Curator Leg Gua		ort nistrator	Other (specify)	
Surname and Name				
Place of Birth	()	Date of Birt	th	
		Gender	M F	
Country of Birth		Nationality		
Residence				
City	Region	ZIP Code	Country	
Domicile (fill in only if different from re	sidence)			
City	Region	ZIP Code	Country	
Type of document		N°	Date of Issue	
Issuing Authority			Expiry Date	
Profession				
The Executor is a Politically Exp	·	tive or a close conne		·
YES Position Held/Rela	-		N	10
Have you covered the status of YES Until			□ NO	`
YES Until			I NI	•

In the case that there are more executors/delegates/legal representatives or other subjects who act in the name and on behalf of the client, fill in more copies of the present section.

³ **Executor** (art. 1 comma 2, lett. P of lgs. Decree 231/07 and subsequent amendments): the person who is appointed to act in the name and on behalf of the Client or who is granted powers of representation enabling the former to act in the name and on behalf of the Client.



Section C

main debtor)	f the relation is different from	the client (indicate de	etails about the Beneficial Owner, the
Name and Surname			
Place of Birth	()	Date of Birth	
Country of Birth		Nationality	
		Gender	M F
Residence			
City	Pagian	ZIP	Country
City	Region	Code	Country
Domicile (fill in only if different	from residence)	710	
City	Region	ZIP Code	Country
Type of document		No	Date of Issue
Type of document		N	
Issuing Authority	-		Expiry Date
The Beneficial Owner is a Pol	· · ·	cet relative of a close	connection with a rollically Exposed
Person? YES Position Held/Related you covered the status	elation	ect relative or a close	NO
Person? YES Position Held/Relate you covered the status YES Until	elation of PEP?		NO
Person? YES Position Held/Relates you covered the status YES Until Pending Processes	elation of PEP?		NO
Person? YES Position Held/Relative you covered the status YES Until Pending Processes Tax Processes	elation of PEP? YES (specify)		NO NO NO NO
Person? YES Position Held/Relates YES Until Pending Processes Tax Processes Criminal Processes	elation of PEP? YES (specify) YES (specify)		NO NO NO NO
Person? YES Position Held/Relates YES Until Pending Processes Tax Processes Criminal Processes Administrative Processes	elation of PEP? YES (specify) YES (specify) YES (specify)		NO NO NO NO
Person? YES Position Held/Relates YES Until Pending Processes Tax Processes Criminal Processes	elation of PEP? YES (specify) YES (specify) YES (specify)		NO NO NO NO
Person? YES Position Held/Relates YES Until Pending Processes Tax Processes Criminal Processes Administrative Processes	elation of PEP? YES (specify) YES (specify) YES (specify) YES (specify) me final with condemnation		NO NO NO NO
Person? YES Position Held/Ro Have you covered the status YES Until Pending Processes Tax Processes Criminal Processes Administrative Processes Past Processes that have become	elation of PEP? YES (specify) YES (specify) YES (specify) me final with condemnation YES (specify)		NO NO NO NO NO NO
Person? YES Position Held/Ro Have you covered the status YES Until Pending Processes Tax Processes Criminal Processes Administrative Processes Past Processes that have become Tax Processes	elation of PEP? YES (specify) YES (specify) YES (specify) me final with condemnation YES (specify) YES (specify) YES (specify)		NO NO NO NO NO NO NO
Person? YES Position Held/Roman	elation of PEP? YES (specify) YES (specify) YES (specify) me final with condemnation YES (specify) YES (specify) YES (specify)		NO NO NO NO NO NO NO NO NO

In the case that there are more Beneficial Owners, fill in more copies of the present section.

⁴ For the definition of Beneficial Owner refer to the information at the footnotes.



ny responsibility: It direct It direct Other Name and Surn Place of Birth Country of Birth Residence	ctly/indirectly h	olds the owner	rship of the client	ent	
Other Name and Surn Place of Birth Country of Birth Residence	ame	olds the contro	ol of the client	Date of Birth	
Name and Surn Place of Birth Country of Birth Residence	ame	(_)	Date of Birth	
Name and Surn Place of Birth Country of Birth Residence	ame	(_)	Date of Birth	
Name and Surn Place of Birth Country of Birth Residence	ame	(_)	Date of Birth	
Place of Birth Country of Birth Residence		(_)	Date of Birth	
Country of Birth					
Residence				Nationality	
				Gender	M F
City					
			Region _	ZIP Code	Country
Domicile (fill in o	only if different fro	om residence)		<u></u>	
				ZIP	
City			Region _	Code	Country
Type of docume	ent			N°	Date of Issue
Issuing Authorit	·y				Expiry Date
Profession					
Person?	ition Held/Relat	ion	erson, a direct	relative or a close c	connection with a Politically Exposed NO NO
	_				NO
Pending Processes Tax Processes	i	YES	(snecify)		NO
Criminal Processe	c				NO NO
Administrative Pro					NO NO
Past Processes tha			, , , , , , , , , , , , , , , , , ,		
Tax Processes					NO
Criminal Processe	ς.				NO

In the case that there are more Beneficial Owners, fill in more copies of the present section.



The Client is an I	talian/foreign corporation		
loted the definition of Benefiny responsibility:	icial Owner indicated in the present	Customer Due Dil	ligence Questionnaire I declare unde
It directly holds r	nore than 25% of the share capital o	of the client	
It indirectly holds companies or thin		al of the client (t	through subsidiary companies, trust
Holds the majorit	ry of the voting rights which may be	cast at the client	's ordinary shareholders' meeting
Holds sufficient v	otes to exercise a dominant influenc	e in the client's o	rdinary shareholders' meeting
In force of partic	ular contractual obligations can exer	cise of a dominar	at influence on the client
Holds powers of i	representation, administration, or ma	anagement powe	rs of the company or of the client
Bankruptcy curat	or		
Name and Surname			
	()	Date of Birth	
		Nationality	
		Gender [M F
Residence			
City	Region	ZIP Code	Country
Domicile (fill in only if differe	· · · · · · · · · · · · · · · · · · ·		
	·	ZIP	Country
City	Region	Code	Country
Type of document		N°	Date of Issue
Issuing Authority			Expiry Date
Profession			
Person?		lative or a close o	connection with a Politically Exposed
YES Position Held/			NO
Have you covered the statu YES Until	s of PEP?		NO
Pending Processes			
Tax Processes	YES (specify)		NO
Criminal Processes	YES (specify)		NO
Administrative Processes	YES (specify)		NO NO
Past Processes that have become	ome final with condemnation		
Tax Processes	VFC (anasifu)		NO
	YES (specify)		
Criminal Processes	YES (specify)		NO NO

In the case that there are more Beneficial Owners, fill in more copies of the present section.



Section D

				_
1. Operation Amour	nt (Only in the o	case of Occasional Operation)		€
Reference Ba Payment network	nk for paym	ents/		holder/Cardhol Last digits of I
3. Nature of the Re	lation/Occasion	al Operation in place		
Repaymer	nt plan	Full and final settlement		Other (specify)
4. Purpose of the R	elation/Occasio	nal Operation in place		
Total exti	nction of the de	ebt position		
Partial ex	tinction of the o	debt position		
Payment	for nurchase	of mortgaged/distrained pr	onerty wit	th contextual extinction of prejudic
formalitie		or moregaged, distramed pr	operty with	an contextual extinction of prejudit
Payment formalitie		mortgage or third purchas	er mortga	ged property to extinguish prejudic
Payment	of third strange	er to the debt position because	e:	
_	of third for nur	hase of credit (Specify nurnos	a navment	\
Payment	or tillia for parc	chase of credit (Specify purpos	е рауппепс)
Other (Sp	pecify)			
Other (Sp	pecify)sed for Relation	n/Occasional Operation in plac	e	
5. Origin of funds u	pecify)sed for Relation	n/Occasional Operation in plac	e statements	
5. Origin of funds u Revenues from v Real estate/financial	sed for Relation work/business <i>p</i> revenue <i>produ</i>	n/Occasional Operation in place produce the last two financial s ce the relative documentation	e statements proving th	ne declaration
5. Origin of funds u Revenues from v Real estate/financial	sed for Relation work/business p revenue produ Finance Compa	n/Occasional Operation in place produce the last two financial some ce the relative documentation ny attach the relative document	e statements proving th	
5. Origin of funds u Revenues from v Real estate/financial Loan from a Bank/f concession bank crea	sed for Relation work/business p revenue produ Finance Compa dit/bank accour	n/Occasional Operation in place produce the last two financial size the relative documentation only attach the relative document financing credit slip	e statements proving the nentation p	ne declaration proving the declaration: e.g. copy of
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Other (Sp. 5. Origin of funds under Revenues from where Real estate/financial Loan from a Bank/ficoncession bank credit Sale of assets (e.g. documentation protection preliminary/notary of Donation produce the Shareholder financing exchange of correspond Capital payment/Shiminutes of the Assertion Other (Specify)	sed for Relation work/business p revenue produ Finance Compa dit/bank accour : machineries, wing the deck leed of sale, sal e relative docum ondence sareholder cont mbly meeting the	n/Occasional Operation in place produce the last two financial size the relative documentation my attach the relative document financing credit slip sheds, commercial, industrial aration: e.g. minutes of the invoices mentation proving the declarates of the Assembly meeting ribution produce the relative mat approved the capital payment	e tatements proving the nentation partition: e.g. continuity that approve documer ent/shareh	ne declaration proving the declaration: e.g. copy of ntial assets, etc.) attach the relative of directors/Shareholders' Meeting, donation act eved the shareholder financing or the ntation proving the declaration: e.g. nolder contribution



Documents to attach:

- copy of the Identification Document of the Client/s, Executor/s, Beneficial Owner/s;
- documentation proving the powers of representation;
- constitutive act and company statute;
- updated Chamber of Commerce registration, not over 90 days and in the case of fiduciary registration of shareholdings entrusted with a specific mandate to "authorised trust companies" for shares > 25% declaration of beneficial ownership produced by the trust company;
- signatures specimen (if needed);

		g the origin of vidual points of		· Relation/Occa nt 5:	sional Op	eration in	place as
other	(specify	eventual	material	provided	by	the	Client)

I, the Undersigned declare, under my own responsibility, pursuant to and in accordance with Legislative Decree n. 231/07 ad successive amendments, that the above statements are truthful and hereby undertake to timely notify the Bank of any changes in the contents hereof.

DATE
SIGNATURE



Normative References: Legislative Decree n. 231/2007 (as subsequently amended and supplemented)

Client Obligations

Art. 22, comma 1 – the clients provide, by writing, under their won responsibility all the necessary and updated information to allow to the obliqed subject to comply with due diligence duties.

Art. 55, comma 3 – If the case does not constitutes a serious crime, anyone who is obliged, pursuant to this Degree, to provide details and information necessary for customer due diligence, provides false information or details, is punished with reclusion from six months to three years and a fine from 10.000 euro to 30.000 euro.

Beneficial Owner Definition – art. 1 comma 2 letter pp) e art.20 of Lgs. Decree 231/2007 And successive amendments

The Beneficial Owner is the natural person/s, other than the client, in the interest of whom, the ongoing business relation is established, the professional performance is rendered, or the operation is executed.

The Beneficial Owner of clients other than natural persons coincides with the natural person/s to whom the direct or indirect property, or the control of the company is attributable.

In the case that the Client is a legal entity, the beneficial owner is the same as:

- a) all natural persons directly holding more than 25% of the share capital or voting rights;
- b) all natural persons indirectly holding more than 25% of the share capital or voting rights, owned through subsidiary companies, trust companies or third parties.

In the absence of verification of one of the hypotheses described above, the beneficial owner coincides with the natural persons who have control of the company by virtue of:

- a) control over the majority of the voting rights which may be cast at a company's ordinary shareholders' meeting;
- b) control of sufficient votes to exercise a dominant influence in the ordinary shareholders' meeting;
- c) the existence of particular contractual obligations that allow the exercise of a dominant influence.
- In the case that the client is a private legal entity, pursuant to the Decree of the President of Republic 10 February 2000, n. 361, the beneficial owners are cumulatively identified as:
- a) the founders, if alive;
- b) the beneficiaries, when identified or easily identifiable;
- c) the holders of powers of representation, administration, or management powers of the company.

Where the application of the criteria referred to in the points above does not enable one or more beneficial owners to be identified unambiguously, the beneficial owner shall be the same as all natural persons with administration or management powers of the company.

Politically Exposed Person Definition - Art. 1, comma 2, letter dd) of Lgs. Decree 231/2007 And successive amendments

Politically Exposed Persons: natural persons who hold or ceased to hold since less than a year, public positions, as well as their direct relatives or other people with whom they are known to have close relationships, as indicated below.

Natural Persons who hold or held important public positions are those that hold or held the position of:

- 1.1 Heads of State, Prime Ministers, ministers and deputy ministers or undersecretaries, Regional Presidents, Mayors, Mayors of cities with a population over 15.000 people and similar position in foreign countries;
- 1.2 Members of Parliament;
- 1.3 Members of central boards of political parties;
- 1.4 Members of Supreme Courts, Constitutional Courts, and of other high-level Judicial Bodies whose decisions are generally subject to any further appeal, except under special circumstances;
- 1.5 Members of the board of directors of central banks and Independent Authorities;
- 1.6 Ambassadors, chargè d'affaires, and top officers of the armed forces;
- 1.7 Members of the administration, management, or supervisory bodies of enterprises controlled, directly or indirectly, by the State, or participated predominantly by regions, cities with a population over 15.000 people;
- 1.8 General Director of ASL and hospital companies and other entities at the service of National Health Care;
- 1.9 Director, Deputy director and member of the Board of directors or subject who holds similar positions in international organizations;
- 2. Direct relatives of Politically Exposed Persons are: the parents, the spouse or the person tied in civil union or domestic partnership or any similar institutions, the children and their spouses or similar institutions;
- 3. Persons with close connections with Political Exposed Persons are:
 - 3.1 Any natural person who is known to hold a joint Beneficial Ownership pf Legal Entities or any other close business relationship with a person who holds or has held an important public position;
 - 3.2 Any natural person who is the sole Beneficial Owner of legal entities of legal institutes that were de facto set up for the benefit of the person who holds or held an important public position.



Section E

lame and Surname of the employee		To be filled by the Bank
The client did not provide the documents and information requested in a complete way The client refused to release the requested documents and information 2. Way of establishment and development of the operation Physical presence of the client (or of his/her representative) Absence of the client, hence impossibility of direct identification 3. Reasonableness of the relation given the activity carried out and the financial resources available The required product or the operation executed appear coherent The required product or the operation executed appear partly coherent The required product or the operation executed appear incoherent 4. Other observations If the identification was carried out with physical presence of the client the undersigned, in charge of identification pursuant to the Legislative Decree n. 231/07 ad successive amendments eclare, under my own responsibility, to have proceeded at the identification in accordance with the AML legislation an at the gathered information correspond to the documents show and attachments and to the information provided be ine client. The signatures hereof have been made in person and in the presence of the indicated persons and dul leastified. Islande and Surname of the employee. Islande and Surname of the employee. Islandersigned, in charge of identification pursuant to the Legislative Decree n. 231/07 ad successive amendments eclare, under my own responsibility, to have proceeded at the identification in accordance with the AML legislation an lat the gathered information correspond to the documents show and attachments and to the information provided be client: By phone By phone Through correspondence via Other (specify) Islander and Surname of the employee Islander and Surname of the employee	1. Client's behavio	our during the identification procedure
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