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BPER BANCA GLOBAL CERTIFICATION REGARDING CORRESPONDENT ACCOUNTS FOR BPER BANCA GROUP ENTITIES

[OMB CONTROL NUMBER 1506-0043]

The information contained in this Certification is sought pursuant to Sections 5318(j) and 5318(k) of Title 31 of the United State Code, as added by sections 313 and 319(b) of the USA PATRIOT Act of 2001 (Public Law 107-56).

This Certification should be completed by any **foreign bank** that maintains a **correspondent account** with any U.S. bank or broker-dealer in securities (**a covered financial institution** as defined in 31 CFR 1010.605(e)). An entity that is not a foreign bank is not required to complete this Certification.

A **foreign bank** is a bank organized under foreign law and located outside of the United States (see definition at 31 CFR 1010.100(u)). A **bank** includes offices, branches, and agencies of commercial banks or trust companies, private banks, national banks, thrift institutions, credit unions, and other organizations chartered under banking laws and supervised by banking supervisors of any state (see definition at 31 CFR 1010.100(d)).[1]

A **correspondent account** for a foreign bank is any account to receive deposits from, make payments or other disbursements on behalf of a foreign bank, or handle other financial transactions related to the foreign bank.

Special instructions for foreign branches of U.S. banks: A branch or office of a U.S. bank outside the United State is a foreign bank. Such a branch or office is not required to complete this Certification with respect to Correspondent Accounts with U.S. branches and offices of the same U.S. bank.

Special instructions for covering multiple branches on a single Certification: A foreign bank may complete one Certification for its branches and offices outside the United States. The Certification must list all of the branches and offices that are covered and must include the information required in Part C for **each** branch or office that maintains a Correspondent Account with a Covered Financial Institution. Use attachment sheets as necessary.

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[1] A "foreign bank" does not include any foreign central bank or monetary authority that functions as a central bank, or any international financial institution or regional development bank formed by treaty or international agreement.

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A. The undersigned financial institutions, the BPER Banca S.p.A. and its entities listed in the attachment hereto (the "BPER entities") hereby certify as follows:

B. Correspondent Accounts Covered by this Certification:

This Certification applies to **all** accounts established for the BPER entities by Covered Financial Institutions.

C. Physical Presence/Regulated Affiliate Status:

The BPER entities maintain a **physical presence and are regulated affiliates.** That means:

- The BPER entities have a place of business at the street address set forth in the attachment hereto, where they employ one or more individuals on a full-time basis and maintain operating records related to their banking activities.
- The BPER entities are authorized to conduct banking activities in the countries where their place of business is located.
- The BPER entities headquartered in Italy are subject to inspection by Banca d'Italia, the banking authority that licensed BPER Banca to conduct banking activities. Additionally, for anti-money laundering and anti-terrorist financing purposes the BPER Banca Group entities headquartered outside of Italy are subject to supervision by the local banking supervisory agencies, namely **BPER Bank Luxembourg S.A.** is supervised by Commission de Surveillance du Secteur Financier 283, route d'Arlon, L-1150 Luxembourg.

D. Indirect Use of Correspondent Accounts:

No Correspondent Account maintained by a Covered Financial Institution may be used to indirectly provide banking services to certain foreign banks. The BPER entities hereby certify that they do **not** use any Correspondent Account with a Covered Financial Institution to indirectly provide banking services to any foreign bank that does not maintain a physical presence in any country and that is not a regulated affiliate.

E. Ownership Information:

BPER Banca's shares are publicly traded. Publicly traded means that the shares are traded on an exchange or an organized over-the-counter market that is regulated by a foreign securities authority as defined in section 3(a)(50) of the Securities Exchange Act of 1934 (15 U.S.C. 78c(a)(50)).

F. Process Agent:

The following individual or entity: Legal Support Services, Inc. is a resident of the United States at the following street address: 500, Kappock Street, Room 4-L, New York City NY 10463, **and** is authorized to accept service of legal process on behalf of Foreign Bank from the Secretary of the Treasury or the Attorney General of the United States pursuant to Section 5318(k) of title 31, United States Code.

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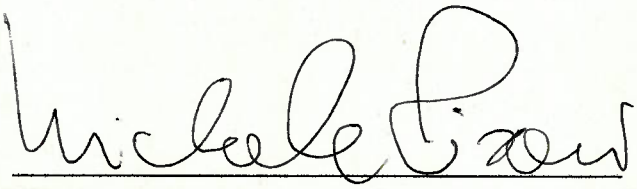
G. General:

The BPER entities hereby agree to notify in writing each Covered Financial Institution at which they maintain any Correspondent Account of any change in facts or circumstances reported in this Certification. Notification shall be given within 30 calendar days of such change.

The BPER entities understand that each Covered Financial Institution at which they maintain a Correspondent Account may provide a copy of this Certification to the Secretary of the Treasury and the Attorney General of the United States. The BPER entities further understand that the statements contained in this Certification may be transmitted to one or more departments or agencies of the United States of America for the purpose of fulfilling such departments' and agencies' governmental functions.

I, Michele Pisani, certify that I have read and understand this Certification, that the statements made in this Certification are complete and correct, and that I am authorized to execute this Certification on behalf of the BPER entities.



MICHELE PISANI

HEAD OF BPER Banca GROUP AML DEPT.

Executed on this 24th day of July, 2019.

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ATTACHMENT TO THE GLOBAL CERTIFICATION
REGARDING CORRESPONDENT ACCOUNTS FOR BPER BANCA GROUP ENTITIES

BPER Entities covered by this Questionnaire	*Address*	*City*	*Zip Code*	*Country*	*Regulator*
BPER Banca S.p.A. *(Parent Bank of the BPER Banca Banking Group)*	Via S. Carlo, 8/20	MODENA	41121	Italy	Bank of Italy
BANCO DI SARDEGNA S.p.A.	Piazzetta Banco di Sardegna, 1	SASSARI	07100	Italy	Bank of Italy
BANCA DI SASSARI S.p.A.	Viale Mancini, 2	SASSARI	07100	Italy	Bank of Italy
CASSA DI RISPARMIO DI BRA S.p.A.	Via Principi di Piemonte 12	BRA	12042	Italy	Bank of Italy
CASSA DI RISPARMIO DI SALUZZO S.p.A.	Corso Italia, 86	SALUZZO (CN)	12037	Italy	Bank of Italy
BPER BANK LUXEMBOURG S.A.	30, Boulevard Royal	LUXEMBOURG	L-2449	Grand Duché de Luxembourg	Commission de Surveillance du Secteur Financier
EMILIA ROMAGNA FACTOR S.p.A.	Strada Maggiore, 29	BOLOGNA	40125	Italy	Bank of Italy
OPTIMA S.p.A. – SIM	Via Aristotele, 195	MODENA	41126	Italy	Bank of Italy
SARDALEASING S.p.A.	Via Quattro Novembre, 27	SASSARI	07100	Italy	Bank of Italy