



Financial Institution Name:

Location (Country) :

EURIZON CAPITAL REAL ASSET SGR S.p.A.

Italy

No #	Question	Answer
1. ENTITY & OWNERSHIP		
1	Full Legal name	Eurizon Capital Real Asset SGR S.p.A.
2	Append a list of foreign branches which are covered by this questionnaire (if applicable)	N/A
3	Full Legal (Registered) Address	Via Melchiorre Gioia n. 22, 20124 Milan - Italy
4	Full Primary Business Address (if different from above)	N/A
5	Date of Entity incorporation/establishment	August 5, 2019
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	N/A
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	Owned by Eurizon Capital SGR S.p.A. (51% voting rights), Poste Vita S.p.A. (12,25% voting rights), BancoPosta Fondi S.p.A. SGR (12,25% voting rights) and Intesa Sanpaolo Vita S.p.A. (24,5% voting rights)
7	% of the Entity's total shares composed of bearer shares	No bearer shares are issued
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	N/A
9	Does the Bank have a Virtual Bank License or provide services only through online channels?	No
10	Provide Legal Entity Identifier (LEI) if available	81560081EB02F8095508

2. AML, CTF & SANCTIONS PROGRAMME

11	Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:	
11 a	Appointed Officer with sufficient experience/expertise	Yes
11 b	Adverse Information Screening	Yes
11 c	Beneficial Ownership	Yes
11 d	Cash Reporting	Yes
11 e	CDD	Yes
11 f	EDD	Yes
11 g	Independent Testing	Yes
11 h	Periodic Review	Yes
11 i	Policies and Procedures	Yes
11 j	PEP Screening	Yes
11 k	Risk Assessment	Yes
11 l	Sanctions	Yes
11 m	Suspicious Activity Reporting	Yes
11 n	Training and Education	Yes
11 o	Transaction Monitoring	Yes
12	Is the Entity's AML, CTF & Sanctions policy approved at least annually by the Board or equivalent Senior Management Committee?	Yes, internal policies and procedures are periodically reviewed and approved by the Board of Directors.
13	Does the Entity use third parties to carry out any components of its AML, CTF & Sanctions programme?	Yes
13 a	If Y, provide further details	Record keeping and transaction monitoring requirements are fulfilled also with the support of an administrative outsourcer.
14	Does the entity have a whistleblower policy?	Yes

3. ANTI BRIBERY & CORRUPTION

15	Has the Entity documented policies and procedures consistent with applicable ABC regulations and requirements to reasonably prevent, detect and report bribery and corruption?	Yes
16	Does the Entity's internal audit function or other independent third party cover ABC Policies and Procedures?	Yes
17	Does the Entity provide mandatory ABC training to:	
17 a	Board and Senior Committee Management	Yes
17 b	1st Line of Defence	Yes
17 c	2nd Line of Defence	Yes
17 d	3rd Line of Defence	Yes

17 e	Third parties to which specific compliance activities subject to ABC risk have been outsourced	Yes, the administrative outsourcer fulfills its training needs autonomously.
17 f	Non-employed workers as appropriate (contractors/consultants)	N/A
4. AML, CTF & SANCTIONS POLICIES & PROCEDURES		
18	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report:	
18 a	Money laundering	Yes
18 b	Terrorist financing	Yes
18 c	Sanctions violations	Yes
19	Does the Entity have policies and procedures that:	
19 a	Prohibit the opening and keeping of anonymous and fictitious named accounts	Yes
19 b	Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs	Yes
19 c	Prohibit dealing with other entities that provide banking services to unlicensed banks	Yes
19 d	Prohibit accounts/relationships with shell banks	Yes
19 e	Prohibit dealing with another Entity that provides services to shell banks	Yes
19 f	Prohibit opening and keeping of accounts for Section 311 designated entities	Yes
19 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
19 h	Assess the risks of relationships with domestic and foreign PEPs, including their family and close associates	Yes
19 i	Define the process for escalating financial crime risk issues/potentially suspicious activity identified by employees	Yes
19 j	Outline the processes regarding screening for sanctions, PEPs and Adverse Media/Negative News	Yes
20	Has the Entity defined a risk tolerance statement or similar document which defines a risk boundary around their business?	Yes
21	Does the Entity have record retention procedures that comply with applicable laws?	Yes
21 a	If Y, what is the retention period?	5 years or more
5. KYC, CDD and EDD		
22	Does the Entity verify the identity of the customer?	Yes
23	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

24	Which of the following does the Entity gather and retain when conducting CDD? Select all that apply:	
24 a	Customer identification	Yes
24 b	Expected activity	Yes
24 c	Nature of business/employment	Yes
24 d	Ownership structure	Yes
24 e	Product usage	Yes
24 f	Purpose and nature of relationship	Yes
24 g	Source of funds	Yes
24 h	Source of wealth	Yes
25	Are each of the following identified:	
25 a	Ultimate beneficial ownership	Yes
25 a1	Are ultimate beneficial owners verified?	Yes
25 b	Authorised signatories (where applicable)	Yes
25 c	Key controllers	Yes
25 d	Other relevant parties	KYC on Trust includes identification and verification of all parties connected to the legal arrangement (such as trustee, settlor, guardian, beneficiary(ies) and additional ultimate controllers).
26	Does the due diligence process result in customers receiving a risk classification?	Yes
27	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
28	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
29	Is KYC renewed at defined frequencies based on risk rating (Periodic Reviews)?	Yes
29 a	If yes, select all that apply:	
29 a1	Less than one year	Yes
29 a2	1 – 2 years	Yes
29 a3	3 – 4 years	Yes
29 a4	5 years or more	Yes
29 a5	Trigger-based or perpetual monitoring reviews	Yes
29 a6	Other (please specify)	N/A
30	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?	
30 a	Arms, Defence, Military	Restricted
30 b	Correspondent Banks	EDD on a risk based approach
30 b1	If EDD or EDD & restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022?	Yes
30 c	Embassies/Consulates	EDD on a risk based approach
30 d	Extractive industries	EDD on a risk based approach
30 e	Gambling customers	EDD on a risk based approach

30 f	General Trading Companies	EDD on a risk based approach
30 g	Marijuana-related Entities	Restricted
30 h	MSB/MVTS customers	EDD on a risk based approach
30 i	Non-account customers	Prohibited
30 j	Non-Government Organisations	EDD on a risk based approach
30 k	Non-resident customers	Restricted
30 l	Nuclear power	EDD on a risk based approach
30 m	Payment Service Provider	EDD on a risk based approach
30 n	PEPs	Always subject to EDD
30 o	PEP Close Associates	Always subject to EDD
30 p	PEP Related	Always subject to EDD
30 q	Precious metals and stones	EDD on a risk based approach
30 r	Red light businesses/Adult entertainment	EDD on a risk based approach
30 s	Regulated charities	EDD on a risk based approach
30 t	Shell banks	Prohibited
30 u	Travel and Tour Companies	EDD on a risk based approach
30 v	Unregulated charities	EDD on a risk based approach
30 w	Used Car Dealers	EDD on a risk based approach
30 x	Virtual Asset Service Providers	EDD on a risk based approach
30 y	Other (specify)	N/A
31	If restricted, provide details of the restriction	30k: customers in countries with criticalities in terms of cooperation for tax purpose (EU/OECD lists) are subject to restrictions; 30a: allowed dealing with customers only if licenced by Italian/EU gov. to trade in these industries; 30g: allowed to the extent it is handled by the client for medical purposes.
6. MONITORING & REPORTING		
32	Does the Entity have risk based policies, procedures and monitoring processes for the identification and reporting of suspicious activity?	Yes
33	What is the method used by the Entity to monitor transactions for suspicious activities?	Automated
33 a	If manual or combination selected, specify what type of transactions are monitored manually	
34	Does the Entity have regulatory requirements to report suspicious transactions?	Yes
34 a	If Y, does the Entity have policies, procedures and processes to comply with suspicious transactions reporting requirements?	Yes
35	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		
36	Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards?	N/A

37	Does the Entity have policies, procedures and processes to reasonably comply with and have controls in place to ensure compliance with:	
37 a	FATF Recommendation 16	N/A
37 b	Local Regulations	N/A
37 b1	If Y, Specify the regulation	N/A
37 c	If N, explain	N/A
8. SANCTIONS		
38	Does the Entity have a Sanctions Policy approved by management regarding compliance with sanctions law applicable to the Entity, including with respect to its business conducted with, or through accounts held at foreign financial institutions?	Yes
39	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
40	Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists?	Yes
41	Select the Sanctions Lists used by the Entity in its sanctions screening processes:	
41 a	Consolidated United Nations Security Council Sanctions List (UN)	Used for screening customers and beneficial owners (i.e. reference data)
41 b	United States Department of the Treasury's Office of Foreign Assets Control (OFAC)	Used for screening customers and beneficial owners (i.e. reference data)
41 c	Office of Financial Sanctions Implementation HMT (OFSI)	Used for screening customers and beneficial owners (i.e. reference data)
41 d	European Union Consolidated List (EU)	Used for screening customers and beneficial owners (i.e. reference data)
41 e	Lists maintained by other G7 member countries	Not used
41 f	Other (specify)	Internal lists, including those issued by local regulator.
42	Does the Entity have a physical presence, e.g. branches, subsidiaries, or representative offices located in countries/regions against which UN, OFAC, OFSI, EU or G7 member countries have enacted comprehensive jurisdiction-based Sanctions?	No
9. TRAINING & EDUCATION		
43	Does the Entity provide mandatory training, which includes:	
43 a	Identification and reporting of transactions to government authorities	Yes

43 b	Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered	Yes
43 c	Internal policies for controlling money laundering, terrorist financing and sanctions violations	Yes
43 d	New issues that occur in the market, e.g. significant regulatory actions or new regulations	Yes
44	Is the above mandatory training provided to :	
44 a	Board and Senior Committee Management	Yes
44 b	1st Line of Defence	Yes
44 c	2nd Line of Defence	Yes
44 d	3rd Line of Defence	Yes
44 e	Third parties to which specific FCC activities have been outsourced	The administrative outsourcer fulfills its training needs autonomously.
44 f	Non-employed workers (contractors/consultants)	N/A
10. AUDIT		
45	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, ABC, Fraud and Sanctions policies and practices on a regular basis?	Yes

Signature Page

Wolfsberg Group Financial Crime Compliance Questionnaire 2023 (FCCQ V1.2)

EURIZON CAPITAL REAL ASSET SGR S.p.A.

I, MATTEO BENZONI, Anti-money Laundering Responsible Officer, certify that I have read and understood this declaration, that the answers provided in this Wolfsberg FCCQ are complete and correct to my honest belief.



Milan, September 9, 2024

WOLFSBERG GROUP FINANCIAL CRIME COMPLIANCE QUESTIONNAIRE (FCCQ) V1.2

Declaration Statement

Eurizon Capital Real Asset SGR S.p.A. is fully committed to the fight against financial crime and makes every effort to remain in full compliance with all applicable financial crime laws, regulations and standards in all of the jurisdictions in which it does business and holds accounts.

Eurizon Capital Real Asset SGR S.p.A. understands the critical importance of having effective and sustainable controls to combat financial crime in order to protect its reputation and to meet its legal and regulatory obligations.

Eurizon Capital Real Asset SGR S.p.A. further certifies that information provided in this Wolfsberg FCCQ Questionnaire will be kept current and will be updated no less frequently than on an annual basis.

Eurizon Capital Real Asset SGR S.p.A. commits to file accurate supplement information on a timely basis.

I, Matteo Benzoni (MLRO), certify that I have read and understand this declaration, that the answers provided in this Wolfsberg FCCQ Questionnaire are complete and correct to my honest behalf, and that I'm authorized to execute this declaration on behalf of **Eurizon Capital Real Asset SGR S.p.A.**

Milan, September 9, 2024

EURIZON CAPITAL REAL ASSET SGR S.p.A.
Anti-money Laundering Responsible Officer
Matteo Benzoni

