



DUE DILIGENCE REPOSITORY

Part A – General administrative information on the Institution

Legal name of Institution	UNIPOL BANCA S.P.A.
Head and Registered Office Address	BOLOGNA, ITALY (physical presence) Piazza della Costituzione 2 40128 BOLOGNA
Licensing Authority	BANCA D'ITALIA
BIC CODE / SWIFT ADDRESS	BAECIT2B
Phone	+39 (0)51 3544111
Fax	+39 (0)51 3544100
E-MAIL address	info@unipolbanca.it

UNIPOL Banca is subject to the regulatory authority of BANCA D'ITALIA.
UNIPOL Banca is not a Publicly Traded Entity and is not Publicly Owned.

Part B – Activities and Operations

The main business lines of UNIPOL Banca are:

- retail, private and commercial banking
- asset management
- insurance

UNIPOL Banca has 299 branches (as of 31/03/10) located all over Italy.

UNIPOL Banca does not have branches or subsidiaries abroad.

UNIPOL Banca has a Representative Office for Asia and Middle East in Singapore.



Part C – Ownership and Management Information

Main shareholders of UNIPOL Banca are UNIPOL GRUPPO FINANZIARIO S.P.A. (in short UGF S.P.A.), owning 67,74% shares of UNIPOL Banca, and UNIPOL ASSICURAZIONI S.P.A., owning 32,26% shares of UNIPOL Banca.

UNIPOL S.P.A. is a Publicly Traded Entity on Italian Stock Exchange.

Chairman of UNIPOL Banca is Mr. Oscar GUIDETTI.

Vice Chairman is Mr. Gilberto COFFARI.

General Manager is Mr. Luciano COLOMBINI.

Deputy General Manager is Mr. Fabio COLOMBERA.

Part D – Programs for Money Laundering Prevention

In Italy there are laws and regulations enacted against money laundering; UNIPOL Banca abides by such laws and regulations.

According to such laws and regulations, all Italian banks are required to periodically report to the regulatory body all transactions executed by any individual or entity over the threshold of Euro 15.000,00.

UNIPOL Banca has a written policy against money laundering; this policy, applicable to the headquarters, all branches and subsidiaries, lays down internal controls and procedures for operations recording and suspicious activities reporting.

Specific training is provided to all staff members on money laundering prevention. The regulatory body which oversees UNIPOL Banca Anti Money Laundering arrangements is BANCA D'ITALIA in Rome.

UNIPOL Banca has established an Anti Money Laundering Office within the Internal Auditing Department and designated a Money Laundering Reporting Officer (MLRO).

The MLRO in charge is Mr. Andrea CURZIO. He may be contacted at our Head Office address or via e-mail (andrea.curzio@unipolbanca.it).



To our knowledge, no slippage ever happened in complying with all regulatory requirements of our licensing and regulatory authorities and with our internal policies and procedures.

Part E – Relationships with “shell banks”

UNIPOL Banca does not maintain correspondent banking relationships with, nor offers correspondent services to, any “shell bank”.

Part F – Know Your Customer Policy

UNIPOL Banca, according to Italian Laws and Regulations, requires identification of all individuals and entities at the establishment of a relationship.

In case of non-established customers (walk-ins), identification is always required. Customer Due Diligence (KYC) is conducted, together with screening of account openings, using reasonable and updated resources. All relevant data are recorded and maintained according to Italian Laws and Regulations.

UNIPOL Banca does not have any anonymous or numbered account in its books.

Part G – Anti Terrorist Financing Arrangements

In Italy, Anti Terrorist Financing Arrangements are regulated and overseen by BANCA D’ITALIA.

UNIPOL Banca abides by these Arrangements in full.

Part H – Additional Information

UNIPOL Banca has never had any regulatory or criminal enforcement action resulting from violations of AML Laws and Regulations, nor has ever been subject of any investigation, indictment, conviction or civil enforcement action related to financing terrorists, in the last five years.



UNIPOL Banca cooperates with local authorities so as to permit investigation of suspicious activities and, if necessary, provides evidence for prosecution of criminal behaviour.

This Due Diligence Repository was completed by Mr. Stefano DEPOLITI, Manager of International Department of UNIPOL Banca S.p.A., and is based on his best knowledge and belief.

It is updated and presents an accurate representation of the existing state of UNIPOL Banca Anti Money Laundering and Anti Terrorist Financing Procedures.

For any further information you may contact Mr. Stefano DEPOLITI at UNIPOL Banca Head Office address or via e-mail (stefano.depoliti@unipolbanca.it), or the staff of UNIPOL Banca International Department – Correspondents section:

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