



DUE DILIGENCE REPOSITORY

Part A – General administrative information on the Institution

Legal name of Institution	UGF BANCA S.P.A.
Head and Registered Office	BOLOGNA, ITALY (physical presence)
Address	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@ugfbanca.it

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

Part B – Activities and Operations

The main business lines of UGF Banca are:

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

UGF Banca has 299 branches (as of 31/12/08) located all over Italy.

UGF Banca does not have branches or subsidiaries abroad.

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

Part C – Ownership and Management Information

Main shareholder of UGF Banca is UNIPOL GRUPPO FINANZIARIO S.P.A., (in short UGF S.P.A.).

UGF owns 67,744% shares of UGF Banca.

UGF is a Publicly Traded Entity on Italian Stock Exchange.

Chairman of UGF Banca is Mr. Pierluigi STEFANINI.

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; UGF 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 3.098,74 (ex ITL 6.000.000).

UGF 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 UGF Banca Anti Money Laundering arrangements is BANCA D'ITALIA in Rome.

UGF Banca has established a Compliance Office within the Internal Auditing Department and designated a Money Laundering Reporting Officer (Compliance Officer).

The Compliance Officer in charge is Mr. Carlo MANDRIOLI. He may be contacted at our Head Office address or via e-mail (carlo.mandrioli@ugfbanca.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”

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

Part F – Know Your Customer Policy

UGF 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.

UGF 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.

UGF Banca abides by these Arrangements in full.

Part H – Additional Information

UGF 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.

UGF 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. Andrea MARCHI, manager of International Department of UGF 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 UGF Banca Anti Money Laundering and Anti Terrorist Financing Procedures.

For any further information you may contact Mr. Andrea MARCHI at UGF Banca Head Office address or via e-mail (andrea.marchi@ugfbanca.it), or the staff of UGF Banca International Department – Correspondents section:

Mr. Adriano DI MARTINO (adriano.dimartino@ugfbanca.it)

Ms. Ilaria FORNASINI (ilaria.fornasini@ugfbanca.it)