

KYC – IDENTIFICATION OF INDIVIDUALS – D.Lgs. 231/07 – ANTI MONEY LAUNDERING

Holder
 Guarantor
 Beneficial Owner*

This statement is provided pursuant to the provisions of art. 21 Legislative Decree 21st November 2007, 231 - Implementation of Directive 2005/60/EC on the prevention of the use of the financial system for the laundering of proceeds from criminal activities and financing of terrorism – with the aim of providing the information necessary for the verification of the customer as provided for in Title II - Chapter I - Section I of the same Decree 231/2007.

Personal Information:

Name and Surname			
Nationality		Fiscal Code	
Place and date of Birth		Country of Birth	
Home Address			Country of residence
ID Document	Type	N.	Issued by
	Date of issue	Date of expiry	

Information regarding the status of politically exposed person (PEP) **

-Do you hold or have you held the PEP status in the last year? **YES** **NO**

-Are you in a close or familial relationship with a PEP? **YES** **NO**

If so, specify the name of the PRP and your relationship: _____

Relationship with Fidea srl staff

Do you have any relationship with the sales representative or any other person working in Fidea srl? **YES** **NO**

Se **SI**, specificare il nome: _____

Information regarding employment

Employment sector: _____

<input type="checkbox"/> EMPLOYED EXECUTIVE <input type="checkbox"/> EMPLOYED NON-EXECUTIVE <input type="checkbox"/> ENTREPRENEUR <input type="checkbox"/> SOLE TRADER/FREELANCER <input type="checkbox"/> PENSIONER <input type="checkbox"/> OTHER (PLEASE SPECIFY) _____

If employee please specify the organizational position: _____

Company Name: _____ Listed **YES** **NO**

If entrepreneur please describe the company activities: _____

Company Name: _____ Listed **YES** **NO**

If sole trader/freelancer please describe the activity: _____

Country in which the main current activities take place***: _____ other countries in which the activities take place****: _____

Previous employment (to be filled in case of job change or retirement in the last 12 months)	
Field of activity:	
Former employer:	
Position held:	

Information on lending institution:

Bank:	Address	VAT	Branch:
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Information on current application:

Date of collection:	Date of stipulation:	Amount:
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CLIENT

I declare that the information given in this form is accurate, true and updated.

Date and Place _____ **Client Signature** _____

FIDEA SRL REPRESENTATIVE

The undersigned declares to have identified the applicant and the other parties in accordance with arts. 18 and 19 of Legislative Decree 21st November 2007, No. 231. The undersigned also certifies that the information required under the Group Policy in terms of knowledge of the customer (KYC) referred to in this form has been collected.

Date and Place _____

FIDEA SRL Signature _____

*** Beneficial Owner:**

The Beneficial Owner is the person on whose behalf a transaction or activity is carried out, that is, in the case of a legal entity, the individual or individuals who ultimately own or control this entity, and become beneficiary according to the following criteria:

A. In case of companies:

1. The individual or individuals who ultimately own or control a legal entity through the direct or indirect ownership or control of a sufficient percentage of the shares in the share capital or of the voting right within that legal entity, including through bearer shares, as long as it is not a company listed on a regulated market and subject to disclosure requirements consistent with the Community legislation or subject to equivalent international standards; this criterion is satisfied with the percentage of 25 per cent plus one of participation in the share capital;
2. The individual or individuals who exercise control over the management of a legal entity;

B. In case of legal entities such as foundations and legal institutes such as trusts, which administer and distribute funds:

1. where the future beneficiaries have already been determined, the individual or individuals who receive 25 percent or more of the property of a legal entity;
2. where the beneficiaries have not yet been determined, the class of persons in whose main interest a legal entity is set up or operates;
3. the individual or individuals who exercise control over the 25 per cent or more of the assets of a legal entity.

****Politically Exposed Person**

Individuals who hold or have held public prominent functions, or who are family members or in close relationship with them. In particular:

1. Individuals who hold or have held public prominent functions are:

- a) people in high positions in international bodies and international organizations of the EU
- b) heads of state
- c) heads of government
- d) Consuls and Ambassadors
- e) PEP also classified as Publicly Exposed
- f) other representatives of government (e.g. Ministers, Prefects etc.)
- g) high executives in the constitutional organs (e.g. Mps)
- h) senior judges of the Judicial Authorities (including EU and international ones)
- i) officers of the armed forces (e.g. police)
- j) high executives of the central, local and peripheral government
- k) chairmen and members of governing bodies of state and international regulators (Bank of Italy, Consob, the Data Protection Authority, AGCM, CESR, the CNIL, AMF, SEC, etc.)
- l) high executives of the regulators, of the armed forces and of the police
- m) high executives of the constitutional organs
- n) presidents, high executives and supervisory bodies of public entities and public companies
- o) high religious authorities.

2. Close family members are:

- a) spouse
- b) sons/daughters and their spouses
- c) those who have cohabited in the last five years with individuals referred to above
- d) parents

3. To identify individuals with whom the persons referred to in No. 1 have close relationship we mean:

- a) any individual who is known to have the joint beneficial ownership of legal entities or any other close business relationship with an individual referred to in paragraph 1 above;
- b) any individual who has the sole beneficial ownership of legal entities known to have been created for the benefit of an individual referred to in paragraph 1.

Note:

The status of Politically Related Person lasts a year from the date at which the person ceases holding the public office.

*** Don't fill in if retired

**** Don't fill in if retired or employed non-executive

**** Don't fill in if non-executive employed or retired