



CLIENT STATEMENT

Anti-money laundering duties provided for by Legislative Decree 231/2007

In compliance with the provisions of art. 22 pursuant to Legislative Decree no. 231/2007¹ and subsequent amendments and supplements, I, the undersigned, hereby provide the following information, acknowledging my own liabilities – of civil, administrative and criminal nature – in case of false statements.

The undersigned _____
Tax Code _____
Place of birth _____ (____)
Date of birth ____/____/_____
Address _____ (____)

Nationality:

- Date of birth and residence stated as per attached identification document
- Domicile different to the attached identification document

_____ (____) _____

Type of ID _____
Number _____
Released on date _____

I DECLARE

¹ Pursuant to Article 2, paragraphs 4 and 5, of Legislative Decree no. 231 of 21st November 2007 (hereinafter "Legislative Decree no. 231/2007"), "**money laundering**" means:

- a) the conversion or transfer of goods, carried out knowing that they come from a criminal activity or from a participation in such activity, with the purpose of hiding or concealing the illegal origin of the goods themselves or to help anyone involved in such activity to evade the legal consequences of their actions;
- (b) the concealment or disguise of the true nature, source, location, disposition, movement, ownership of property or rights thereon, knowing that such property is derived from criminal activity or from an act of participation in such activity;
- (c) the acquisition, possession or use of property, knowing at the time of receipt that such property was derived from criminal activity or from an act of participation in such activity;
- (d) participation in any of the acts referred to in points (a), (b) and (c), association for the purpose of committing such an act, an attempt to commit such an act, aiding, abetting or counselling someone to commit such an act or facilitating the commission of such an act.

Money laundering shall be regarded as such even if the activities which generated the goods to be recycled took place outside national boundaries. Knowledge, intention or purpose, which must be an element of the actions referred to in paragraph 4 may be inferred from objective factual circumstances.

Pursuant to Article 2, paragraph 6, of Legislative Decree no. 231/2007, "**financing of terrorism**" means any activity directed, by any means, to the supply, collection, provision, intermediation, deposit, custody or disbursement, in any way, of funds and economic resources, directly or indirectly, in whole or in part, usable for the performance of one or more conducts, for purposes of terrorism in accordance with the provisions of criminal law, regardless of the actual use of funds and economic resources for the commission of the aforementioned conduct.

- that, pursuant to Article 18, par.1, letter c) of Legislative Decree no. 231/2007, the **purpose** and **nature** of the professional services requested are:

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- - not to be a **politically exposed person** (foreign or domestic)², pursuant to Article 1, par. 2, letter dd) of Legislative Decree no. 231/2007, *or*
 - not to have had PEP status for more than one year.
 - for the purposes of identifying the **Beneficial Owner**³ referred to under Article 1, par. 2, letter pp) and the criteria for determining the effective ownership of customers other than natural persons referred to in Article 20 of Legislative Decree no. 231/2007, having acknowledged the criminal liabilities provided for under Article 55 of Legislative Decree no. 231/2007 in case of false indication of false information on the particulars of the subject on behalf of which the operation is carried out:

² Pursuant to Article 1, paragraph 2, letter dd), of "Legislative Decree no. 231/2007", "**politically exposed persons**" means: natural persons who occupy or have ceased to occupy important public positions for less than a year, as well as their family members and those who have close ties with the aforementioned persons, as listed below:

1) those who hold or have held important public positions are natural persons who hold or have held the office of: 1.1 President of the Republic, Prime Minister, Minister, Vice-Minister and Undersecretary, President of the Region, Regional Councillor, Mayor of a provincial capital or metropolitan city, Mayor of a municipality with a population of not less than 15,000 inhabitants and similar offices in foreign states; 1.2 deputy, senator, European parliamentarian, regional councillor and similar offices in foreign countries; 1.3 member of the central governing bodies of political parties; 1.4 judge of the Constitutional Court, magistrate of the Court of Cassation or of the Court of Auditors, state councillor and other members of the Administrative Justice Council for the Sicilian Region and similar offices in foreign countries; 1.5 Member of the governing bodies of central banks and independent authorities; 1.6 Ambassador, in charge of business or equivalent positions in foreign States, senior officer of the armed forces or similar positions in foreign States; 1.7 member of the administrative, management or control bodies of companies controlled, even indirectly, by the Italian State or by a foreign State, or owned, mainly or totally, by the Regions, by municipalities, provincial capitals and metropolitan cities and by municipalities with a total population of not less than 15,000 inhabitants; 1.8 general manager of ASL and of a hospital company, of a university hospital company and of the other bodies of the national health service. 1.9 director, deputy director and member of the management body or person performing equivalent functions in international organisations;

2) are family members of politically exposed persons: parents, spouse or person in a civil partnership or de facto cohabitation or institutions similar to the politically exposed person, children and their spouses as well as persons related to children in a civil partnership or de facto cohabitation or similar institutions;

3) are persons with whom the politically exposed persons are known to have close links: 3.1 are natural persons linked to the politically exposed person by virtue of their joint beneficial ownership of legal entities or other close business relations; 3.2 are natural persons who only formally hold totalitarian control of an entity known to have been constituted, in fact, in the interest and for the benefit of a politically exposed person.

³ Pursuant to Article 1, paragraph 2, letter pp) of Legislative Decree no. 231/2007, "**beneficial owner**" means the natural person or persons, other than the client, in the interest of whom or for whom, in the final instance, the continuing relationship is established, the professional service is rendered or the operation is performed.

Art. 20 of Legislative Decree no. 231/2007 (Criteria for determining the effective ownership of customers other than natural persons).

1. The beneficial owner of customers other than natural persons coincides with the natural person or persons to whom, in the final instance, the direct or indirect ownership or control of the entity is attributable.

2. In the event that the customer is a joint-stock company: a) the ownership of more than 25 % of the customer's capital held by a natural person is an indication of direct ownership; b) the ownership of more than 25 % of the customer's capital held through subsidiaries, trust companies or third parties is an indication of indirect ownership.

3. In cases where an examination of the ownership structure does not make it possible to identify unambiguously the natural person or persons to whom the direct or indirect ownership of the entity is attributable, the beneficial owner coincides with the natural person or persons to whom, in the final instance, control of the entity is attributable by virtue of: a) control of the majority of the votes that can be exercised in an ordinary shareholders' meeting; b) control of sufficient votes to exercise a dominant influence in an ordinary shareholders' meeting; c) the existence of particular contractual ties that allow a dominant influence to be exercised.

4. In the event that the client is a private legal person, as per Presidential Decree no. 361 of 10th February 2000, the following are cumulatively identified as beneficial owners: a) the founders, if alive; b) the beneficiaries, if identified or easily identifiable; c) the holders of management and administration functions

5. If the application of the criteria set out in the preceding paragraphs does not allow the unambiguous identification of one or more beneficial owners, the beneficial owner coincides with the natural person or persons with powers of administration or management of the company.

6. The obligated parties shall keep a record of the verifications carried out for the purpose of identifying the beneficial owner.



to act on their (his) own behalf and, therefore, the inexistence of a different beneficial owner as provided for and defined by Legislative Decree no. 231/2007;

to act on behalf of the following beneficial owners:

Name and surname _____
Tax Code _____
Place of birth _____ (___)
Date of birth ___/___/_____
Address _____ (___)

Name and surname _____
Tax Code _____
Place of birth _____ (___)
Date of birth ___/___/_____
Address _____ (___)

to act on behalf of the following Company/Entity:

Company _____
Registered office in _____
Address _____
Company's House of _____
Tax Code _____
VAT Number _____

whose Beneficial Owners are:

Name and surname _____
Tax Code _____
Place of birth _____ (___)
Date of birth ___/___/_____
Address _____ (___)

Name and surname _____
Tax Code _____
Place of birth _____ (___)
Date of birth ___/___/_____
Address _____ (___)

that the beneficial owner(s) is/are not **politically exposed person(s)** (foreign or national), pursuant to Article 1, par. 2, letter dd) of Legislative Decree no. 231/2007;



that the beneficial owner(s) has/have not been **politically exposed person(s)** (foreign or national), pursuant to Article 1, par. 2, letter dd) of Legislative Decree no. 231/2007 for at least 1 year.

- the relations between the *Client (natural person or company/body client of the professional)* and the beneficial owner and, where relevant, the executor are
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Place and Date _____

Client's Signature

Place and Date _____

Signature of the person carrying out the
identification⁴

_____ ⁴ Identification performed by the Customer's tax/legal advisor or by the person delegated for this identification.



The Undersigned _____

SPECIFICALLY DECLARES

- i) to have examined and understood the definitions regarding "politically exposed persons", "beneficial owner" and "financing of terrorism" in the bottom of the Attachment to this statement,
- ii) to be aware of the criminal sanctions provided for by art. 55, par. 3, Legislative Decree no. 231/2007, for those who provide false data or false information,
- iii) to have been made aware of the circumstance that the default in providing, in all or in part, the information referred to above can jeopardize the required Law Firm's professional service

and

UNDERTAKES

to notify without delay to the Law Firm each and any amendment or variation of the data herein provided.

The undersigned also acknowledges that their personal data will be processed by the Firm exclusively for the purposes provided for by Legislative Decree no. 231/2007 in compliance with the obligations under EU Regulation 2016/679 for data protection.

Place and Date _____

Client's Signature