

## INTEGRATED CUSTOMER DUE DILIGENCE (“CDD”) FORM

(PURSUANT TO ITALIAN LEGISLATIVE DECREE N. 231/2007 IMPLEMENTING Directive (EU) 2015/849 AS AMENDED)

By signing this Form, the interested party declares to have read the "Information notice for customers" section contained at the bottom of it. We also invite you to read the information provided on the customer's obligations and on the criminal sanctions provided for by Legislative Decree no. lgs. n. 231/2007 in case of false or untruthful declarations. **The information contained in this Form, once completed, is to be considered confidential.**

### A. CUSTOMER IDENTIFICATION

**Legal name:**

**Tax code (if any)<sup>1</sup>:**

*Institutional headquarter*

**Legal address:**

**City:**

**Country:**

### B. CUSTOMER STATEMENTS

- a) The Customer adopted and implemented internal regulations aimed at ensuring compliance with the applicable anti- bribery and corruption legislative framework
- b) The Customer adopted and implemented internal regulations at ensuring compliance with the international standards and international regulations on the Countering of the Terrorism Financing
- c) The Customer's activity complies with the restrictive measures and economic and trade sanctions adopted by the United Nations, the European Union and the USA (OFAC)
- d) The Customer doesn't support or promote, either directly or indirectly through any governmental body or entity, activities linked to anti-personnel mines, cluster munitions and submunitions
- e) The Customer declares that no legal proceeding nor formal investigations by public prosecutors are currently pending against its Beneficial Owner for a violation of anti-bribery ad anti-corruption laws and/or and/or anti-money laundering and combating terrorism financing laws

***In case it is not possible to flag one or more declarations above, please provide details:***

<sup>1</sup> Tax Code is included among the identification data if it is issued by the Italian Revenue Agency.

## B.2 “Major Sanctioned Countries (MSC) Questionnaire”

With reference to the business relationship/transaction between the Customer and CDP, please provide the following information about the Customer and any other governmental body involved in the business relationship/transaction with CDP (jointly, the “Entities”):

- a) Direct or indirect involvement of the MSC or of any entity or institution based in the MSC;
- b) Involvement of transactions to/from MSC (regardless of their value) involving the oil & gas sector, nuclear energy, arms and weapons, dual use goods or technologies.

**If yes, please fill the boxes with details:** (i) the name of the relevant entity or institution; (ii) details on the project or activity involving the oil & gas sector, nuclear energy, arms and weapons, dual use goods or technologies.

**NORTH KOREA**

YES  NO

Type of involvement:  a)  b)

**SYRIA**

YES  NO

Type of involvement:  a)  b)

**VENEZUELA**

YES NO

Type of involvement: a)  b)

**IRAN**

YES NO

Type of involvement: a)  b)

## B.2 "Major Sanctioned Countries (MSC) Questionnaire"

### CRIMEA

YES

NO

Type of involvement:            a)  b)

### NON-CONTROLLED AREAS OF UKRAINE

The expression "Non-Controlled Areas of Ukraine" means the areas of Ukraine not controlled by the Ukrainian government as defined in the notion of "specified territories" pursuant to Article 1 of Regulation (EU) no. 263/2022.

YES

NO

Type of involvement:             a)  b)

### BIELORUSSIA

YES

NO

Type of involvement:            a)  b)

### RUSSIA

YES

NO

Type of involvement:             a)  b)

**B.2 "Major Sanctioned Countries (MSC) Questionnaire"**

**IF ANY INVOLVEMENT OF RUSSIA AND/OR BIELORUSSIA IS DECLARED:**

**1) indicate if such involvement concerns one of the following sectors**

- (a) Energy**
- (b) Aerospace**
- (c) Minerals**
- (d) Telecommunications**
- (e) Transport**
- (f) Defence**
- (g) Siderurgy**
- (h) Luxury**

**2) confirm that such involvement does not concern:**

- (a)** business relations with the Donbass or other territories of Ukraine not subject to Ukrainian government control as a result of military intervention by the Russian Federation;
  - (b)** business relationships with entities or individuals subject to asset freeze measures;
  - (c)** dual-use goods and technologies;
  - (d)** quasi-dual-use assets that could aid in Russia's military and technological advancement or in the development of the defense and cyber security, information security, sensor and laser, marine, aerospace and propulsion;
  - (e)** other business relationships, services, goods and technologies subject to restrictive measures adopted following the Russian-Ukrainian crisis.
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#### D. IDENTIFICATION OF THE EXECUTOR (the Undersigned)

When the Customer is a legal entity, “executor” means the natural person acting on behalf of the customer upon due authorization (i.e. person empowered to act).

**Source of the power to act on behalf of the customer:**

Legal Representative

Appointment Resolution

Proxy Statement

Other (*specify*):

**Role:**

*Identification data*

**Surname:**

**Name:**

**Tax Code (if any)<sup>4</sup>:**

**Date of Birth:**

**Country of Birth:**

*Place of residence*

**Address:**

**City:**

**Country:**

*Place of domicile (if different from residence)*

**Address:**

**City:**

**Country:**

<sup>4</sup> Tax Code is included among the identification data if it is issued by the Italian Revenue Agency.

## E. IDENTIFICATION OF THE BENEFICIAL OWNER

“Beneficial owner” means any natural person(s) who ultimately owns or controls the Customer and/or the natural person(s) on whose behalf a transaction or activity is being conducted.

When the Customer’s ownership and control structure does not allow the unambiguous identification of natural persons to whom the direct or indirect ownership of the body or its control is attributable (e.g. as in the cases of public bodies and public law bodies), the beneficial owner coincides with the natural person who has the powers of legal representation, administration or management (e.g. depending on the nature of the Customer, the beneficial owner could be identified in the Ministry or the Head of the Department).

### E.1 Identity details of the beneficial owner

#### Identification data

**Surname:**

**Name:**

**Tax Code (if any)<sup>5</sup>:**

**Date of Birth:**

**Country of Birth:**

*Place of domicile (if different from residence)*

**Address:**

**City:**

**Country:**

*Place of domicile (if different from residence)*

**Address:**

**City:**

**Country:**

#### Main source of income

**Company employee**

**Public employee**

**On pension**

**Company manager**

**Public Manager**

**Recipient of other incomes**

**Business man**

**Self-Employed**

**Other** Specify:

Indicate the sector:

**Does the person belong to categories of Politically Exposed Persons (PEP)<sup>6</sup>?**

YES

NO

*If yes, please indicate the public role held and/or the relationship with a Politically Exposed Person and his/her role:*

*Role held:*

<sup>5</sup> Tax Code is included in the identification data if it is issued by the Italian Revenue Agency.

<sup>6</sup> Please, refer to the definition in the endnotes.

**If the beneficial owner is a PEP who does not act as a public administration body, provide the following additional information <sup>(7)</sup>**

**Work condition:**

Work activity:

Sector:

**Business relations in non-EU countries:**

NO  YES (specify the countries):

**Annual income capacity (after tax):**

- |  |                             |
|--|-----------------------------|
| <input type="checkbox"/> up to € 100.000               | from € 100.000 to € 500.000 |
| <input type="checkbox"/> from € 500.000 to € 1.000.000 | over € 1.000.000            |

**Total personal assets (securities and real estate):**

- |   |                               |
|---|-------------------------------|
| <input type="checkbox"/> up to € 500.000                    | from € 500.000 to € 1.000.000 |
| <input type="checkbox"/> up from € 1.000.000 to € 5.000.000 | over € 5.000.000              |

Origin of the funds used in the relationship (where applicable):

<sup>7</sup> PEP acts as a public administration body when all the following conditions are simultaneously met: 1) the customer belongs to one of the following categories: i. public administration of the Italian Republic or a foreign country; ii. companies controlled, even indirectly, by a public administration of the Italian republic or of a foreign country; companies predominantly or wholly owned by the entities referred to in point i); 2) the beneficial owner of the customer coincides with the Natural person who holds the position of senior managing official; 3) the Beneficial Owner assumes the status of PEP exclusively as a member of the Customer's or of the Group Companies' Board of Directors or Auditors.

## F. DECLARATION ON THE PURPOSE AND INTENDED NATURE OF THE BUSINESS RELATIONSHIP

### Intended nature

- Establishment of a financing relationship (loan)
- Request for a disbursement
- Other (*specify*):

### Purpose

#### Country of origin of the funds used in the relationship or operation:

- Italy
- Europe
- non-EU countries (*specify*):

#### Country of destination of the funds involved in the operation

- Italy
- Europe
- non-EU countries (*specify*):

The Undersigned, being aware of the criminal liability to which it may be subject pursuant to art. 55 of Legislative Decree no. 231/2007 in the event of an omission or false information (see following information notice related), in compliance with the provisions of art. 22 of said Decree, declares that the information provided herein is true and complete, even with regard to the beneficial owner.

**Place and Date:**

**Signature of Declarant:**

#### Identification documents to be attached:

1. Only if the Form is not signed with a digital signature valid in Italy, copy of the executor's identification document
2. Only if the executor is different from the legal representative, copy of the document from which the executor's power of act derives

*CDP reserves the right to request, if deemed necessary, a copy of the identification document of the Beneficial Owner or other documents.*

<sup>14</sup> See the following related information notice



**Definition: “Politically Exposed Persons”**

Politically Exposed Persons shall mean:

Natural persons who holds or has ceased to be entrusted for less than a year with prominent public functions and the immediate family members and persons known to be close associates of such persons, identified based on the following criteria:

1. natural persons who are or have been entrusted with prominent public functions shall mean:
  - a) heads of Country, heads of government, ministers and undersecretaries, head and assessor of region, mayor of provincial capital or metropolitan city, mayor of municipality with a population of not less than 15,000 inhabitants and similar offices in foreign countries;
  - b) members of parliament, European parliamentarian, regional councilor and similar offices in foreign countries;
  - c) member of central decision-making bodies of political parties;
  - d) members of supreme courts, constitutional courts and other high-level judicial bodies, whose rulings are not generally subject to further appeal, barring exceptional circumstances;
  - e) members of Country audit offices and of the boards of directors of central banks;
  - f) ambassadors, chargés d'affaires or equivalent positions in foreign countries, high-ranking officials in the armed forces or similar offices in foreign countries;
  - g) members of the administrative, management or supervisory bodies of subsidiaries control, even indirectly, by the Country or by a foreign Country or participated, with a prevalent or totalitarian measure, by the Regions, by provincial capitals and metropolitan cities and by municipalities with a total population of no less than 15,000 inhabitants;
  - h) general manager of ASL or hospital, university hospital and other national health service organizations;
  - i) director, deputy director and member of the management body or entity carrying out equivalent functions in international organizations;
2. Close relatives shall mean: parents, spouses or person linked in civil union or cohabitation in fact or similar institutions to politically exposed children and their spouses as well as persons linked to the children in civil union or cohabitation in fact or similar institutions;
3. For the purposes of identifying the persons with whom the natural persons listed in paragraph 1 above are known to have close relationships, reference shall be made to:
  - a) any natural person who is known to have joint beneficial ownership of legal entities or any other close business relationship with a person referred to in paragraph 1;
  - b) any natural person who is the sole beneficial owner of legal entities or legal persons known to have been de facto established for the benefit of a person referred to in paragraph 1.

## INFORMATION ON THE CUSTOMERS' OBLIGATIONS PROVIDED FOR D. LGS. N. 231 OF 21 NOVEMBER 2007

### Article 22 "Obligations of the customer"

Customers shall provide in writing, on their own responsibility, all the necessary and updated information for the natural and legal persons subject to this decree to comply with the customer due diligence requirements.

### Article 55 paragraph 3 "Criminal sanctions"

Unless the act constitutes a more serious crime, anyone who is obliged, pursuant to this decree, to provide the data and information necessary for the identification due diligence, provides false data or information, shall be punished with from six months' to three years imprisonment and a fine of from €10,000 to €30,000.

## INFORMATION NOTICE FOR CUSTOMERS

### 1. Data Controller

Pursuant to the European Regulation 2016/679 (below GDPR), Cassa Depositi e Prestiti S.p.A. (below, CDP), with head office in Rome, via Goito n. 4 (00185), processes your personal data in its capacity as "Data Controller" in compliance with the provisions of law and informing you of the use of said personal data. The Personal Data Protection Officer can be contacted by writing to the email address [privacy@cdp.it](mailto:privacy@cdp.it).

### 2. Sources and type of data processed

The personal data held by CDP are collected directly from the customers or from third parties, for example Public Administrations, Public Registers, Chambers of Commerce, Databases of private companies. The data processed by CDP can include personal information (*first name, surname, date of birth, address, image, sex, marital status, tax identification no., etc.*) and contact information, as well as in specific cases the photo of the identification document (front/back), personal data present in the identification document used and photo of the face present in the video selfie procedure.

Furthermore, in complying with specific requirements relative to management of the business relationship (for example mandatory communications to the Authorities), and in the case of customer communications, CDP may process particular categories of data in accordance with art. 9 GDPR and data relating to criminal convictions and offences in accordance with art. 10 of the GDPR.

### 3. Purpose and legal basis of the data processing

The personal data are processed during the normal activity of CDP according to the following purposes: a) Purposes strictly connected with and instrumental to the establishment and management of relations with the customers pursuant to art. 6 paragraph 1 letter b) GDPR; b) purposes deriving from legal obligations, regulations, EU law, provisions issued by authorities authorized for the purpose by the law or by supervisory and control bodies pursuant to art. 6 paragraph 1 letter c) GDPR. Provision of personal data for the above purposes is necessary to finalize, carry out or continue the contract relationship with CDP.

### 4. Data processing method

In relation to the purposes specified, processing of the personal data is carried out by manual, IT and telematic instruments using logic appropriate for the purposes and, in any case, such as to guarantee the security and confidentiality of the data. Protection is ensured also in the presence of innovative instruments introduced by CDP.

Furthermore, it may happen that CDP uses specific identification techniques carried out through an automated technique based on the comparison between the image of the document you upload, and a video of your face recorded in real time. The verification activity is aimed at authenticating the documents and comparing the portrait of the face present on an identity document (e.g., identity card, passport, driving license, health card) with the image extracted from a video selfie taken directly by you.

### 5. Storage of personal data

Your personal data will be stored only for the time necessary for the purposes for which they are collected in accordance with the principle of minimization pursuant to art. 5.1.c) GDPR.

### 6. Categories of subjects to whom the data can be communicated

For pursuit of the above purposes, CDP may communicate your personal data to third parties if said data communication operations are instrumental to the services requested and provided. Your data may furthermore be communicated to managers of private credit information systems. Further communications will be possible to guarantors, if relevant to the existing guarantee relationship. Your data may furthermore be communicated to companies forming part of the group, for administrative and accounting purposes, and to third parties in compliance with legal requirements. The subjects belonging to the above-mentioned categories perform the function of Data Supervisor or operate totally autonomously as distinct Data Controllers.

### 7. Transfer data outside the EU

CDP will carry out the processing in accordance with the procedures permitted by the current law, such as consent of the Data Subject, adoption of standard clauses approved by the European Commission, selection of subjects adhering to international programs for the free circulation of data (e.g. EU-USA Privacy Shield) or operating in countries considered safe by the European Commission.

### 8. Rights of the Data Subject

You are informed that art. 15-22 GDPR entitle the Data Subjects to exercise specific rights. These rights can be exercised by request sent by post to Cassa depositi e prestiti S.p.A., via Goito, n. 4, 00185 Rome, att. Personal Data Protection Officer, or by email directly to said Officer, at the contacts provided in point 1. The Data Subject also has the right to raise complaints with the Italian Data Protection Authority.