

Banca popolare dell'Emilia Romagna

Co-operative bank

Head Office: Via San Carlo 8/20, Modena

Banca popolare dell'Emilia Romagna Banking Group - Registration No. 5387.6

GLOBAL CERTIFICATION REGARDING CORRESPONDENT ACCOUNTS for Banca popolare dell'Emilia Romagna ENTITIES (the Parent Bank and its subsidiaries as listed hereinafter)

The information contained in this Certification is sought pursuant to Sections 5318(j) and 5318(k) of Title 31 of the United States Code, as added by sections 313 and 319(b) of the USA PATRIOT Act of 2001 (Public Law 107-56).

This Certification should be completed by any **foreign bank** that maintains a **correspondent account** with any U.S. bank or U.S. broker-dealer in securities (a **covered financial institution** as defined in 31 C.F.R. 103.175(f)). An entity that is not a foreign bank is not required to complete this Certification.

A **foreign bank** is a bank organized under foreign law and located outside of the United States (see definition at 31 C.F.R. 103.11(o)). A **bank** includes offices, branches, and agencies of commercial banks or trust companies, private banks, national banks, thrift institutions, credit unions, and other organizations chartered under banking laws and supervised by banking supervisors of any state (see definition at 31 C.F.R. 103.11(c)).*

A **Correspondent Account** for a foreign bank is any account to receive deposits from, make payments or other disbursements on behalf of a foreign bank, or handle other financial transactions related to the foreign bank.

Special instruction for foreign branches of U.S. banks: A branch or office of a U.S. bank outside the United States is a foreign bank. Such a branch or office is not required to complete this Certification with respect to Correspondent Accounts with U.S. branches and offices of the same U.S. bank.

Special instruction for covering multiple branches on a single Certification: A foreign bank may complete one Certification for its branches and offices outside the United States. The Certification must list all of the branches and offices that are covered and must include the information required in Part C for **each** branch or office that maintains a Correspondent Account with a Covered Financial Institution. Use attachment sheets as necessary.

* A "foreign bank" does not include any foreign central bank or monetary authority that functions as a central bank, or any international financial institution or regional development bank formed by treaty or international agreement.

A. The undersigned financial institutions, the Banca popolare dell'Emilia Romagna entities listed in the attachment hereto (the "BPER entities"), hereby certify as follows:

B. Correspondent Accounts Covered by this Certification:

This Certification applies to **all** accounts established for the BPER entities by Covered Financial Institutions.

C. Physical Presence/Regulated Affiliate Status:

The BPER entities maintain a **physical presence and are regulated affiliates**. That means:

The BPER entities have a place of business at the street address set forth in the attachment hereto, where they employ one or more individuals on a full-time basis and maintain operating records related to their banking activities;

The BPER entities are authorized to conduct banking activities in the countries where their place of business is located;

The BPER entities headquartered in Italy are subject to inspection by Banca d'Italia, the banking authority that licensed Banca popolare dell'Emilia Romagna to conduct banking activities.

Additionally, for anti-money laundering and anti-terrorist financing purposes the BPER entities headquartered outside of Italy are subject to supervision by the local banking supervisory agencies, namely:

- **Banca popolare dell'Emilia Romagna International (Europe) S.A. – Luxembourg** is supervised by:
Commission de Surveillance du Secteur Financier
110, route d'Arlon
L-2991 Luxembourg

- **EMRO Finance Ireland Limited** is supervised by:
Central Bank of Ireland
College Green
Dublin 2

D. Indirect Use of Correspondent Accounts:

No Correspondent Account maintained by a Covered Financial Institution may be used to indirectly provide banking services to certain foreign banks. The BPER entities hereby certify that they do **not** use any Correspondent Account with a Covered Financial Institution to indirectly provide banking services to any foreign bank that does not maintain a physical presence in any country and that is not a regulated affiliate.

E. Ownership Information:

Banca popolare dell'Emilia Romagna's shares are publicly traded. Publicly traded means that the shares are traded on an exchange or an organized over-the-counter market that is regulated by a foreign securities authority as defined in section 3(a)(50) of the Securities Exchange Act of 1934 (15 U.S.C. 78c(a)(50)).

F. Process Agent:

The following individual or entity: Legal Support Services, Inc. is a resident of the United States at the following street address: 500, Kappock Street, Room 4-L, New York City NY 10463, **and** is authorized to accept service of legal process on behalf of the BPER entities from the Secretary of the Treasury or the Attorney General of the United States pursuant to Section 5318(k) of title 31, United States Code.

G. General:

The BPER entities hereby agree to notify in writing each Covered Financial Institution at which they maintain any Correspondent Account of any change in facts or circumstances reported in this Certification. Notification shall be given within 30 calendar days of such change.

The BPER entities understand that each Covered Financial Institution at which they maintain a Correspondent Account may provide a copy of this Certification to the Secretary of the Treasury and the Attorney General of the United States. The BPER entities further understand that the statements contained in this Certification may be transmitted to one or more departments or agencies of the United States of America for the purpose of fulfilling such departments' and agencies' governmental functions.

I, Michele Pisani, certify that I have read and understand this Certification, that the statements made in this Certification are complete and correct, and that I am authorized to execute this Certification on behalf of the BPER entities.

Michele Pisani

Head of AML Dept.

Banca popolare dell'Emilia Romagna



Modena, 19 May 2014

**ATTACHMENT to BPER GLOBAL CERTIFICATION regarding CORRESPONDENT
ACCOUNTS for BPER ENTITIES**

Banca popolare dell'Emilia Romagna Entities covered by this AML Questionnaire	Address	City	Zip Code	Country
Banca popolare dell'Emilia Romagna Soc. Coop. (the Parent Bank of the BpER Banking Group)	Via S. Carlo, 8/20	MODENA	41121	Italy
BANCA POPOLARE DI RAVENNA S.p.A.	Via Guerrini, 14	RAVENNA	48121	Italy
BANCA DELLA CAMPANIA S.p.A.	Via Filangieri, 36	NAPOLI	80121	Italy
BANCA POPOLARE DEL MEZZOGIORNO S.p.A.	Via Napoli, 60	CROTONE	88900	Italy
BANCO DI SARDEGNA S.p.A.	Piazzetta Banco di Sardegna, 1	SASSARI	07100	Italy
BANCA DI SASSARI S.p.A.	Viale Mancini, 2	SASSARI	07100	Italy
BANCA POPOLARE DELL'EMILIA ROMAGNA (EUROPE) INTERNATIONAL S.A.	30, Boulevard Royal B.P. 215	LUXEMBOURG	L-2012	Grand Duché de Luxembourg
EMRO FINANCE IRELAND LIMITED	2 Grand Canal Square – Grand Canal Harbour	DUBLIN 2		Ireland
ABF LEASING S.p.A.	Via De Amicis, 51	MILANO	20123	Italy
EMILIA ROMAGNA FACTOR S.p.A.	Strada Maggiore, 29	BOLOGNA	40125	Italy
ESTENSE COVERED BOND S.r.l.	Via Vittorio Alfieri, 1	CONEGLIANO (TV)	31015	Italy
MUTINA S.r.l.	Via Aristotele, 195	MODENA	41126	Italy
NETTUNO GESTIONE CREDITI S.p.A.	Via Giacomo Venezian, 5	BOLOGNA	40121	Italy
OPTIMA S.p.A. – SGR	Via Aristotele, 195	MODENA	41126	Italy
SARDALEASING S.p.A.	Via Quattro Novembre, 27	SASSARI	07100	Italy
