



Assicurazioni Generali S.p.A.

Anti-Financial Crime Questionnaire

Client information		
1	Full Legal name	Assicurazioni Generali S.p.A.
2	Full Legal (Registered) Address	Trieste (Italy), Piazza Duca degli Abruzzi 2
3	Date of Entity incorporation/establishment	Company established in Trieste in 1831
4	Publicly Traded, Exchange traded	Milan Stock Exchange
6	Ownership details	Please see the following link: https://www.generali.com/investors/share-information-analysts/ownership-structure
7	Does the Entity, or any of its branches, operate under an Offshore Banking License (OBL)?	No
8	Legal Entity Identifier (LEI)	549300X5UKJVE386ZB61

Description of Anti Money Laundering (AML), Counter Terrorism Financing (CTF) and Anti Bribery and Corruption program		
AML Policies, Practices and Procedures		Yes / No
9	Does your AML program include written policies and procedures consistent with applicable AML/CTF laws and regulations?	Yes
10	Has your AML/CTF program been approved by Senior Management?	Yes
11	Does the AML/CTF program include a designated officer to coordinate and oversee the AML/CTF framework?	Yes
12	Do you have an Internal Audit function covering AML/CTF policies and practices on a regular basis?	Yes
Know Your Customer, Due Diligence and Enhanced Due Diligence		Yes / No
14	Do you have policies and procedures that:	
14.1	set out when CDD should be completed, e.g. at the time of onboarding?	Yes
14.2	foresee the identification and verification of the Ultimate Beneficial Owners?	Yes
14.3	result in customers receiving a risk classification?	Yes
14.4	include the screening of customers and connected parties to determine whether they are PEPs, or controlled by PEPs?	Yes

14.5	foresee the review and escalation of potential matches from screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?	Yes
15	Do you refrain opening relationships with shell banks?	Yes
16	Do you refrain opening or involving operations with anonymous relationships?	Yes
Monitoring and Reporting		Yes / No
17	Do you have policies and procedures which foresee:	
17.1	the update of the KYC at defined frequencies based on the risk rating assigned to customers?	Yes
17.2	the review and escalation of matters arising from the monitoring of customer operations and activity?	Yes
17.3	the reporting of suspicious transactions to the FIUs?	Yes
17.4	record-keeping of AML/CTF relevant data in line with applicable laws?	Yes
AML Training		Yes / No
25	Do you provide AML/CTF trainings?	Yes
26	Are AML/CTF trainings provided to the employees on ongoing basis?	Yes
Anti Bribery and Corruption		Yes / No
27	Do you have documented policies and procedures consistent with applicable ABC regulations and requirements to reasonably prevent, detect and report bribery and corruption?	Yes
28	Did you appoint a designated a responsible function and/or officer with sufficient experience/expertise for coordinating the ABC program?	Yes
29	Do you provide ABC training?	Yes
30	Do you have an internal audit function covering ABC Policies and Procedures?	Yes
31	Do you have defined and implemented an internal process for the proper handling of undue gifts and a record keeping system for received/offered gifts, hospitality and entertainments?	Yes
32	Do you have defined an internal process to refrain any political contribution?	Yes

Date:

Milan, July 9, 2024

Signature:

Michele Valeriani - Group Chief Anti Financial Crime Officer


