



BANCO BPM Società per Azioni GLOBAL CERTIFICATION
REGARDING CORRESPONDENT ACCOUNTS FOR BANCO BPM SpA ENTITIES
[OMB Control Number 1506-0043]

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. 1010.605 (e)). 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. 1010.100(u)). A **bank** includes offices, branches, and agencies of commercial banks or trust companies, private banks, national banks, thrift institutions credit unions, and other organisations chartered under banking laws and supervised by banking supervisors of any state (see definition at 31C.F.R. 103.11(d)).¹

A **Correspondent Account** for a foreign bank is any account to receive deposits from, make payments or other disbursements on behalf 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. The undersigned financial institutions, the BANCO BPM SpA and its entities listed below (the "**BANCO BPM entities**"), hereby certify as follows:

B. Correspondent Accounts Covered by this Certification:

This Certification applies to all accounts established for the BANCO BPM entities by Covered Financial Institutions.

C. Physical Presence/Regulated Affiliate Status:

The BANCO BPM and its entities maintain a physical presence and the BANCO BPM entities are regulated affiliates of BANCO BPM Società per Azioni, which maintains a physical presence at Piazza Filippo Meda, 4 – 20121 MILANO – ITALY, where it employs one or more persons on a full-time basis and maintains operating record. That means that each entity:

- Has a place of business at the Street address set forth below, where it employs one or more individuals on a full-time basis and maintains operating records related to its banking activities;
- Is authorised to conduct banking activities in the country where its place of business is located;
- Is subject to inspection by the Banking Authorities identified below that licensed the particular BANCO BPM entity to conduct banking activities; and
- Is subject to supervision by the local banking supervisory agencies identified at the end of this document that regulate BANCO BPM.

¹ 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.

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 BANCO BPM 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:

The BANCO BPM entities are owned by BANCO BPM Società per Azioni, Piazza Filippo Meda 4, 20121 MILANO ITALY, whose shares are publicly traded.

F. Process Agent:

AGENT SERVICE INC. - 179, Bennett Avenue, Suite 4C, New York, NY 10040 USA - is authorised to accept service of legal process on behalf of the BANCO BPM entities, see attached, that have a Correspondent Account with a Covered Financial Institution 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 BANCO BPM and its 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 BANCO BPM 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 BANCO BPM 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, Carlo Fratta Pasini, certify that I have read and understand this Certification, that the statements made in this Certification are complete and correct, and that I am authorised to execute this Certification on behalf of the BANCO BPM entities.

BANCO BPM

Chairman

Carlo Fratta Pasini



February 8, 2018

ATTACHMENT TO Banco BPM S.p.A.: Patriot Act



Banco BPM entities	Address						Banking Authority	Agents
	Street	City	State	Zip Code	Country			
Banco BPM SpA	Piazza Filippo Meda, 4 (Registered Head Office) Piazza Nogara, 2 (Administrative Head Office)	Milano Verona	Italy	20121 37121	Italy	ECB - European Central Bank Bank of Italy		
Banca Popolare di Milano SpA	Piazza Filippo Meda, 4	Milano	Italy	20121	Italy	Bank of Italy		
BANCA ALETTI & C. SpA	Via Roncaglia, 12	Milano	Italy	20146	Italy	Bank of Italy		
BANCA AKROS SpA	Viale Eginardo, 29	Milano	Italy	20149	Italy	Bank of Italy		
ALETTI GESTIELLE SGR SpA	Via Tortona, 35	Milano	Italy	20144	Italy	Bank of Italy		
BANCA ALETTI & C. (Suisse) S.A.	Via Magatti, 6 C.P. 5826	Lugano	Switzerland	CH 6900	Switzerland	Autorité fédérale surveillance des marchés financiers Bank of Italy		

Process Agent:
AGENT SERVICE INC.