

MAJOR SANCTIONED COUNTRIES (MSC) QUESTIONNAIRE

SIMEST, in order to act in compliance with the regulatory framework with which it manages the risk relating to international financial sanctions (mainly UN, EU, US), strives, among other things, to understand the extent of its Counterparties' activities with certain sensitive or more sanctioned Countries or territories.

Please provide the following information regarding the Counterparty, its parent companies, each of its subsidiaries pursuant to art. 2359 of the Italian Civil Code and to each joint venture invested, both in Italy and abroad ("the Group"). Further information may be requested by SIMEST from the Counterparty following the review of this document.

The questionnaire must be filled in all its fields and correctly dated and signed.

A. COUNTERPARTY IDENTIFICATION DATA

Company Name:

Tax ID:

Economic sector (including ATECO)

Geographical area of main performance of the activity:

Company listed on a regulated EU market:

YES ☐ NO ☐

In the case of a legal entity not registered in the Chamber of Commerce (whose data are therefore not available through the Chamber of Commerce certificate), provide the following additional information regarding the registered office:

Registered office address

Address:

Municipality:

Country:

In case of a non-profit organization, specify the class of beneficiaries to whom the activities carried out are addressed

Beneficiary class:

B. DECLARATIONS OF THE MAJOR SANCTIONED COUNTRIES ("MSC")

Indicate whether the Counterparty, the parent companies, each of its subsidiaries pursuant to art. 2359 of the Italian Civil Code and each joint venture invested, both in Italy and abroad ("the Group") have or plan to have in the Countries or territories below:

- a) legal or operational headquarters (including – by way of example and even if inactive – offices, plants, branches, representative offices);
- b) business relations of the Counterparty, of the individual Group company that may be interested or overall Group revenues, indicating the relative percentage of revenues;
- c) transactions to/from the Countries or territories listed below, regardless of the amount, involving the oil and gas sector, nuclear programmes, arms or armaments, dual-use goods and technology.

For each Country or territory, the applicable case for the Group (a, b, c) or "n.a." if none of these are applicable must be marked in each section related to each Country or territory below.

In the event of a positive response to one or more of the above categories (a, b, c), describe the type of exposure in the fields provided.

Indicate:

(i) the name (s) of the Company/Companies concerned, its (their) identification code (s) and full address;

(ii) the % of the individual Revenues of the Counterparty, the parent companies, each of its subsidiaries pursuant to art. 2359 of the Italian Civil Code and each joint venture invested generated in the MSC;

(iii) the % of the individual Revenues of the Counterparty, the parent companies, each of its subsidiaries pursuant to art. 2359 of the Italian Civil Code and each joint venture invested generated in the MSC out of the total Group Revenues;

(iv) whether the Company concerned is directly or indirectly involved in the purpose of the transaction;

(v) the source of the Revenues generated in the MSC

Aggregate exposure to the Country RUSSIA

Type of exposure: ☐ a) ☐ b) ☐ c) ☐ n.a.

Aggregate exposure to the Country BELARUS

Type of exposure: ☐ a) ☐ b) ☐ c) ☐ n.a.

Aggregate exposure to UNCONTROLLED UKRAINIAN AREAS

The expression "Uncontrolled Ukrainian Zones" 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.

Type of exposure: ☐ a) ☐ b) ☐ c) ☐ n.a.

Aggregate exposure to Country CRIMEA

Type of exposure: ☐ a) ☐ b) ☐ c) ☐ n.a.

Aggregate exposure to Country IRAN

Type of exposure: ☐ a) ☐ b) ☐ c) ☐ n.a.

Aggregate exposure to the Country VENEZUELA

Type of exposure: ☐ a) ☐ b) ☐ c) ☐ n.a.

Aggregate exposure to the Country SYRIA

Type of exposure: ☐ a) ☐ b) ☐ c) ☐ n.a.

Aggregate exposure to Country NORTH KOREA

Type of exposure: ☐ a) ☐ b) ☐ c) ☐ n.a.

C. IN CASE OF DECLARED EXPOSURE RUSSIA, BELARUS, UNCONTROLLED UKRAINIAN

Where exposure has been declared for Russia, Belarus, Uncontrolled Ukrainian Areas:

A. Indicate whether the exposure relates to any of the following sectors and, if selected, the exposure as a percentage of the selected sector in relation to the total turnover of the Counterparty or Group to which it belongs:

SECTOR

% OF INDUSTRY TURNOVER IN TOTAL TURNOVER

☐ Energy	
☐ Aeronautics & Space	
☐ Minerals	
☐ Telecommunications	
☐ Transport	
☐ Defense	
☐ Steel	
☐ Luxury goods	

B. Confirm that such exposure **does NOT** cover:

- ☐ business relations with uncontrolled Ukrainian Areas;
- ☐ business relationships with persons subject to asset or economic resource freezes or other international sanctions adopted by the United Nations (UN), the European Union, Italy and/or the United States of America (USA);
- ☐ dual-use goods and technologies;
- ☐ 'quasi-dual-use' goods that could contribute to the military and technological improvement of Russia and/or Belarus or to the development of the defence and security sector, in particular in the field of electronics, information technology, information security, sensors and lasers, marine, aerospace and propulsion;
- ☐ other business relationships, services, goods and technology subject to restrictive measures adopted as a result of the Russian-Ukrainian crisis.

D. AGGREGATE EXPOSURE TO "NON-EU" COUNTRIES

Indicate whether the Counterparty or the parent companies or any of its subsidiaries pursuant to art. 2359 of the Italian Civil Code or any joint venture in which it participates, both in Italy and abroad ("the Group") have or plan to have business relations with the following non-EU Countries that exceed, even approximately, 5% of the total individual revenues of the or the "Group" for each non-EU Country indicated:

Brazil, Taiwan, Singapore, Georgia, Indonesia, Egypt, Vietnam, Saudi Arabia, Thailand, Malaysia, China, India, Kyrgyzstan, Turkey, Uzbekistan, Mongolia, Hong Kong, Kazakhstan, Armenia, United Arab Emirates (UAE), Azerbaijan, Israel, Pakistan, South Sudan

YES ☐ NO ☐

- 1) If the answer is yes, please indicate below the individual non-EU Countries with which there are business relationships that exceed, even indicatively, 5% of the total individual revenues of the Counterparty or the "Group"

Non-EU Country	% Counterparty revenues	% "Group" revenues

- 2) If the answer is yes, please provide below the name(s) of the company/companies concerned and its (their) identification code (s), as well as further information regarding the economic activity carried out in each non-EU Country with which there are significant business relationships.

Indicate whether the Counterparty or "the Group" has business relations with other non-EU Countries that exceed, even indicatively, 10% of total Revenues:

YES ☐ NO ☐

If yes, please indicate the additional relevant non-EU Countries and the % of revenues of both the Counterparty and the "Group":

E. TAX TRANSPARENCY

Indicate whether one or more of the following Subjects have their residence or registered office in a "Country of Barrier"¹:

☐ (a) The **Counterparty** ☐ b) The **Beneficial Owner² of the Counterparty** ☐ c) The **Controlling Shareholders of the Counterparty**

1. If yes, please identify the person referred to in (a), (b), (c) above and indicate the "Country of Barrier" (among those listed in the footnote) in which the same has residence or registered office

SUBJECT: (a), (b), (c)	NAME AND SURNAME/COMPANY NAME	COUNTRY

2. If the relevant individual/entity referred to in letters a), b) or c) have their legal seat/place of residence in a "Country of Barrier" please confirm that:

2.1. There are sound business reasons (other than tax reasons) for such location and it is not aimed at taking advantage of the technicalities of a tax system or mismatches between two or more tax systems for the purpose of reducing the tax liability

YES ☐

NO ☐

2.2. they have effective physical location links with such Country (e.g., a significant proportion of the investment in tangible and/or intangible assets is made in that Country, operations in such Country are carried out through local offices, revenues are generated locally, staff are employed locally and/or taxes are paid locally)

YES ☐

NO ☐

¹ Countries for which the competent European and International Authorities have found an unsatisfactory application of the internationally agreed standards on anti-money laundering and the prevention of terrorist financing and, jointly, on tax transparency. For the purposes of this Questionnaire, these Countries are Trinidad and Tobago, Vanuatu, the British Virgin Islands, Vietnam and Russia.

² Pursuant to art. 1 par. 2 lett. pp) and art. 20 of Legislative Decree 231/2007 and subsequent amendments.

3. Indicate whether the Subjects referred to in letters (a), (b), (c) having residence or registered office in a "Country of Barrier" have been the addressees of a final decision, including of administrative ones, of an assessment or subject to objections or proceedings by the competent Authorities with regard to:

3.1. failure to comply with obligations relating to the payment of taxes and duties or social security contributions according to applicable law

YES ☐

NO ☐

3.2. the establishment of an entity in any jurisdiction with the intention of evading tax, social security or other legal obligations

YES ☐

NO ☐

If yes, identify the Subject referred to in letters (a), (b), (c) concerned and provide the required details below:

SUBJECT: (a), (b), (c)	NAME AND SURNAME / COMPANY NAME	AUTHORITIES	DESCRIPTION OF THE CONDUCT ESTABLISHED BY THE FINAL DECISION OR SUBJECT TO DISPUTE OR PROCEEDINGS AND THE STATUS OF THE PROCEEDINGS

If any of the answers to point 2 or 3 above is Yes, please provide any useful additional information concerning the answer provided or attach reference documents which might be useful to substantiate the sound business reasons for links identified:

F. ADDITIONAL DECLARATIONS

The undersigned, as Legal Representative of the Counterparty and/or a person to whom appropriate powers have been conferred by the Counterparty, declares the following:

1. does it operate in accordance with and does not act in circumvention of the framework of international sanctions adopted by the United Nations (UN), the European Union, Italy and/or the United States of America (USA) ?
YES ☐
NO ☐
2. manufactures/markets/exports/imports, directly and/or indirectly, goods or services falling within the scope of EU/US Sanctions Programs concerning restrictive measures against certain Countries:
YES ☐
NO ☐

If the answer to question 2 above is yes, it also states:

2.1 The type of assets falling within the scope of EU/US Sanctions Programs

- 2.2 that the production referred to in the previous point are not exported to Countries subject to export/import restrictions, according to the regulatory provisions introduced by the European Union following the onset of the Russia-Ukraine crisis, as well as to other Countries subject to EU, UN, US-OFAC restrictions

YES ☐
NO ☐

- 2.3 that, as a further guarantee, its customers are asked to not resell the products indicated to these Countries, nor to resell them to third parties who do not undertake to do the same

YES ☐
NO ☐

3. has adopted suitable safeguards to verify on an ongoing basis the evolution of the international sanctions framework, as well as suitable safeguards to exclude involvement in transactions or commercial relationships with parties subject to any applicable restrictive measure, including all measures issued and/or under issuance by the EU and US

YES ☐
NO ☐

If the answer to the question is yes, describe the adopted safeguards.

In the event of a negative answer to the item indicated in question 3 above, the undersigned undertakes to immediately adopt suitable safeguards to verify - on an ongoing basis - the evolution of the international sanctions framework, as well as suitable safeguards to exclude involvement in transactions and commercial relationships with parties subject to any applicable restrictive measure, including all measures issued and/or under issuance by the EU and US.

Describe the safeguards you intend to adopt.

4. manufactures/markets/exports/imports, directly and/or indirectly, goods or services falling within the scope of:

4.1 the national, foreign, European and/or international legislation applicable to the transaction and/or to the Counterparties involved in anyway, concerning restrictions on the export, transfer and/or supply of dual-use items and/or technologies and/or services related thereto (including, but not limited to, Regulation (EU) 2021/821 and Legislative Decree no. 221 of 15 December 2017)

YES ☐

NO ☐

4.2 Law no. 185 of 1990 "New rules on the control of export, import and transit of military materials", implementing Directive 2009/43/EC, which regulates the intra and extra-EU movement of military equipment or supply of goods or services that are otherwise goods subject to an export license (even if they are "dual use" goods)

YES ☐

NO ☐

5. manufactures/markets/exports/imports, directly and/or indirectly, goods that can be used and/or that can be precursors to the production of chemical weapons pursuant to Decision (CFSP) 2018/1544 and Regulation (EU) 2018/1542 and/or toxic gases pursuant to Royal Decree 09.01.1927 no. 147 and subsequent amendments.

YES ☐

NO ☐

6. carries out, directly or indirectly, through parent or subsidiary or associated companies, the activities referred to in Article 1, paragraph 1 of Law no. 220 of 9 December 2021 "Measures to combat the financing of companies producing anti-personnel mines, cluster munitions and submunitions"

YES ☐

NO ☐

If the answer is yes to any of the above items in questions 2, 4, and/or 5 above, please provide at least the following information: (i) details regarding the type of goods; (ii) details regarding any export of such goods to non-EU countries, including the countries involved; (iii) statements confirming compliance with the applicable export control regulations, including details on the type of notification and/or authorization and the relevant competent authority pursuant to the applicable Regulations. Where such notification has been made and/or authorization has been granted, a certified copy must be attached hereto. Where the requested information has already been previously shared, please indicate the transaction reference number and the date of such disclosure.

The undersigned also undertakes, in any case, to immediately provide SIMEST with updates with respect to the above declaration and guarantees, if one or more of the those should no longer be complete, truthful and/or correct, even partially.

The undersigned, as Legal Representative of the Counterparty or a person to whom appropriate powers have been conferred by the Counterparty, declares that the data reported in this Questionnaire correspond to the truth and also declares that have provided all information of which is aware.

Place and date:

Signature of the Legal Representative or person with suitable powers:

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