

Pursuant to Article 20, paragraphs 1 to 5, of Legislative Decree 231/2001, the criteria for determining the beneficial ownership of clients other than natural persons are as follows: "1. For clients other than natural persons the beneficial owner is the natural person or persons to whom direct or indirect ownership or control of the entity is ultimately attributable. 2. If the client is a joint-stock company: a) the ownership of more than 25 per cent of the client's capital, held by a natural person, is considered as direct ownership; b) the ownership of more than 25 per cent of the client's capital, held through subsidiaries, trust companies or third parties, is considered as indirect ownership. 3. In cases where an examination of the ownership structure does not allow the unambiguous identification of the natural person or persons to whom the direct or indirect ownership of the entity is attributable, the beneficial owner is the natural person or persons to whom the control of the entity is ultimately attributable by virtue of: a) control of the majority of the votes exercisable in ordinary shareholders' meetings; b) control of votes sufficient to exercise a dominant influence in ordinary shareholders' meetings; c) the existence of particular contractual obligations that allow the exercise of a dominant influence. 4. In the event that the client is a private legal entity, as per Presidential Decree No. 361 of 10 February 2000, the following are cumulatively identified as beneficial owners: a) the founders, if alive; b) the beneficiaries, if identified or easily identifiable; c) the holders of management and administration functions. 5. Where the application of the criteria set out in the preceding paragraphs does not enable one or more beneficial owners to be clearly identified, the beneficial owner(s) shall correspond to the natural person(s) holding, in accordance with their respective organisational or statutory structures, legal representation, administration or management powers of the company or client in any case other than the natural person".

For the purposes of this document, the following definitions apply: (a) **CLIENT** means any natural or legal person, including a company, firm, association, partnership, trust, foundation, pension fund, insurance company, bank, credit institution, investment manager, administrator, intermediary, President of the Region, Regional Minister, Mayor of a provincial capital or metropolitan city, Mayor of a municipality with a population of not less than 15,000 inhabitants and similar offices in foreign States; (b) **Member of Parliament, Senator, Member of the European Parliament, Regional Councilor and similar offices in foreign States;** (c) **Member of the central governing bodies of political parties;** (d) **Judge of the Constitutional Court, magistrate of the Court of Cassation or the Court of Auditors, State Councilor and other members of the Administrative Council of Justice for the Region of Sicily and similar offices in foreign States;** (e) **Member of the governing bodies of central banks and independent authorities;** (f) **Ambassador, Chargé d'Affaires or equivalent offices in foreign States, senior officer in the armed forces or equivalent offices in foreign States;** (g) **member of the administrative, management or control bodies of companies controlled, even indirectly, by the Italian State or by a foreign State or companies in which the Regions, provincial capitals and metropolitan cities and municipalities with a total population of not less than 15,000 inhabitants hold a majority or total interest;** (h) **general manager of ASL (Local Health Authorities) and of a hospital, university hospital and other bodies of the national health service;** (i) **director, deputy director and member of the management body or person performing equivalent functions in international organisations, public or private bodies, international organisations, international institutions or similar institutions;** (j) **PERSONS KNOWN TO BE CLOSE ASSOCIATES WITH A POLITICALLY EXPOSED PERSON:** are (a) natural persons who, under this Decree, hold jointly with politically exposed person the beneficial ownership of legal entities, trusts and similar legal institutions or entertain close business relationships with the politically exposed person; (b) natural persons who hold only formally the total control of an entity known to have been incorporated, de facto, in the interest and for the benefit of a politically exposed person".



Client identification form pursuant to Italian Legislative Decree No. 231/2007 | Natural person

(to be completed by the client or by the representative, if any, following the various steps)

Pursuant to Italian Legislative Decree No. 231 of 21 November 2007 (hereinafter “**Legislative Decree 231/2007**”), providing for – *inter alia* – measures to prevent and combat money laundering, **Finarte Auctions S.r.l.** is required to collect the following information concerning the identity of each client¹ (hereinafter “**Client**”), representative/proxy² (“*esecutore*” in Italian, hereinafter “**Representative**”) and beneficial owner³ (hereinafter “**Beneficial Owner**”), also with reference to the status, if any, of politically exposed person (hereinafter “**Politically Exposed Person**”). Completion instructions in grey and *italics*.

STEP 1

Client's identification details

Full name

Tax identification number

Place and date of birth

Employment status

- employee*
- self-employed*
- freelance*
- retired
- unemployed
- other (specify)

(for cases marked with *)

Country where the business is mainly carried out

Residence and current address
(if different from residence):

(enter full address details including
postcode)

Identity document

(please attach a copy and specify the
kind of document, issuing authority,
document number, place and date of
issue, expiry date)

This form has been filled in by:

A. the Client (go to STEP 3)

B. a Representative (please fill STEP 2)



STEP 2

Representative form

Full name

Tax identification number

Place and date of birth

Employment status

- employee*
- self-employed*
- freelance*
- entrepreneur
- retired
- unemployed
- other (specify)

(please enter full address details)

Residence and current address
(if different from residence)

Identity document

(please attach a copy and specify kind of document, issuing authority, document number, place and date of issue, expiry date)

Title granting the power to
represent the Client

Politically exposed person: Si No
(please answer yes or no and, if applicable, request and complete the supplementary form for PEPs)

STEP 3

Is the Client also the Beneficial Owner

A.1 Yes

(select an option between A.1.1 and A.1.2)

A.2 No

(please fill in the form below, specifying the Beneficial Owner other than the Client. In case of multiple Beneficial Owners, please ask for an additional form. Then go to STEP 4)

A.1.1 there are other Beneficial Owners

(go directly to STEP 4)

A.1.2 there are no Beneficial Owners other than the Client

(please fill in the form below, specifying the second Beneficial Owner other than the Client. In case of multiple Beneficial Owners, please ask for an additional form. Then go to STEP 4)

Beneficial Owner's identification details

Full name

Tax identification number

Place and date of birth

Residence and current address
(if different from residence)

*(please enter full address details
including postcode)*

Details of the relationship
between the Beneficial Owner/s
and the Client *(for example, in case
of natural persons, family/friendship/
work relationships; in case of legal
entities, corporate relationships)*

Identity document

*(please attach a copy and specify
kind of document, issuing authority,
document number, place and date of
issue, expiry date)*

STEP 4

Nature of the transaction

Please provide the following additional information *(Then, go to STEP 5)*

What is the scope and nature of the
transaction?

mandate to sell

purchase mandate

purchase

consulting

other (specify)

The transaction is carried out for
purposes of a personal or commercial
nature?

Personal reasons

Commercial reasons

other (specify)

STEP 5

Politically Exposed Persons ⁶

Are the Client, the Representative and/or the Beneficial Owner/s politically exposed persons?

A. Yes *(please specify who is the Politically Exposed
Person among those listed)*

A.2 No *(go to STEP 6)*

Identification details of politically exposed persons (PEPs)⁶

Identification of the PEP
(please specify who is the Politically
Exposed Person among those listed)

client
representative
beneficial owner

Position of the PEP
(please specify the position leading
to PEP status, e.g. minister, member
of parliament, senator, mayor, etc.)

Origin of the goods covered by the
mandate to sell or of the funds
used to pay for the service

Family asset/s
Asset/s whose ownership has been acquired

employment income
personal savings
inheritance
donation
financing
other (please specify)

STEP 6

I, the undersigned, hereby declare that the information provided in this form is complete and truthful and undertake to notify any changes in such information without delay, either by email or registered letter with return receipt.

Place and date

Legible signature

1 Pursuant to Article 1, paragraph 2, f) of Legislative Decree 231/2007 **a client is:** "the party who establishes ongoing relationships, performs transactions, or requests or receives a professional service following assignment of an appointment". This term must also be considered as applicable, by extension, to the parties in whose name and on whose behalf the transaction is requested.

2 Pursuant to Article 1, paragraph 2, p) of Legislative Decree **a representative is:** "the party authorised to act in the name and on behalf of the client or who is in any case granted powers of representation that allow him/her to act in the name and on behalf of the client".

3 Pursuant to Article 1, paragraph 2, pp) of Legislative Decree 231/2007 **a beneficial owner is:** "the natural person or natural persons, other than the client, in whose interest the ongoing relationship is ultimately established, the professional service is rendered, or the transaction is performed".

4 Pursuant to Article 1, paragraph 2, dd) of Legislative Decree 231/2007, politically exposed persons are: "natural persons who hold, or have ceased to hold, important public offices for less than a year, as well as their family members and those who have well known close connections with the aforesaid parties, as listed below: 1) natural persons who hold or have held important public offices such as: 1.1 in Italy, president of the republic, prime minister, minister, deputy minister and undersecretary, chair of a regional council, regional councillor, mayor of a city designated as the main city of a province or metropolitan city, mayor of a town with a population of at least 15,000 inhabitants; similar offices abroad; 1.2 in Italy, deputy, senator, member of the European parliament, regional councillor; similar positions abroad; 1.3 member of central governing bodies of political parties; 1.4 in Italy, constitutional court judge, magistrate of the Court of Cassation or of the Court of Audit, state councillor, and other members of the Council of Administrative Justice for the Sicilian Region; similar offices abroad; 1.5 member of the governing bodies of central banks and independent authorities; 1.6 in Italy, ambassador, chargé d'affaires, senior officer in the armed forces; similar positions abroad; 1.7 In Italy, member of the governing, management, or supervisory bodies of companies controlled (directly or indirectly) by the Italian State or by a foreign State or whose equity is held, mainly or wholly, by regional councils, the councils of cities designated as the main city of a province and metropolitan cities, the councils of towns with a population of at least 15,000 inhabitants; 1.8 director general of a local branch of the Italian health service or a hospital, university hospital, or other national health service entities. 1.9 director, deputy director, or member of the managing body, or persons with equivalent positions in international organisations; 2) family members of the aforesaid politically exposed persons: parents, spouse, or partner (by civil union or de facto cohabitation or similar institutions) of the politically exposed person, children and their spouse or partner (by civil union or de facto cohabitation or similar institutions); 3) parties with whom the aforesaid politically exposed persons have well known close connections, i.e. 3.1. natural persons who, pursuant to this decree, are beneficial owners, jointly with the politically exposed person, of legal entities, trusts, and similar legal institutions or who have close business relationships with the aforesaid politically exposed persons; 3.2 natural persons who hold merely formal universal control of a known entity which is, in fact, established in the interest and for the benefit of a politically exposed person as stated above".



Client identification form pursuant to Italian Legislative Decree No. 231/2007 | Legal entity

(to be completed by the client or by the representative, if any, following the various steps)

Pursuant to Italian Legislative Decree No. 231 of 21 November 2007 (hereinafter “**Legislative Decree 231/2007**”), providing for – *inter alia* – measures to prevent and combat money laundering, **Finarte Auctions S.r.l.** is required to collect the following information concerning the identity of each client¹ (hereinafter “**Client**”), representative/proxy² (“*esecutore*” in Italian, hereinafter “**Representative**”) and beneficial owner³ (hereinafter “**Beneficial Owner**”), also with reference to the status, if any, of politically exposed person (hereinafter “**Politically Exposed Person**”). Completion instructions in grey and *italics*.

STEP 1

Client’s identification details

Name

Registered office

Tax identification number / VAT number

Business

Country where the business is
mainly carried out

Represented by:

Full name

Representation powers

Tax identification number

Place and date of birth

Position

Residence and current address
(if different from residence):

*(please enter full address details, including
postcode)*

Identity document

*(please attach a copy and specify
kind of document, issuing authority,
document number, place and date of
issue, expiry date)*

Chi sta compilando il presente modulo identificativo:

A. the Client *(go directly to STEP 3)*

B. a Representative *(please fill the Representative form)*



STEP 2

Representative's identification details

Full name

Tax identification number

Place and date of birth

Employment status

- employee *
- self-employed *
- freelance *
- entrepreneur
- retired
- unemployed
- other (specify)

(please enter full address details)

Residence and current address
(if different from residence)

Identity document

(please attach a copy and specify kind of document, issuing authority, document number, place and date of issue, expiry date)

Title granting the power to
represent the Client

Politically exposed person: Si No
(please answer yes or no and, if applicable, request and complete the supplementary form for PEPs)

STEP 3

Is the Client also the Beneficial Owner⁵⁷

A.1 Yes

(select an option between A.1.1 and A.1.2)

A.2 No

(please fill in the form below, specifying the Beneficial Owner other than the Client. In case of multiple Beneficial Owners, please ask for an additional form. Then go to STEP 4)

A.1.1 there are other Beneficial Owners

(go directly to STEP 4)

A.1.2 there are no Beneficial Owners other than the Client

(please fill in the form below, specifying the second Beneficial Owner other than the Client. In case of multiple Beneficial Owners, please ask for an additional form. Then go to STEP 4)

Beneficial Owner's identification details

Full name

Tax identification number

Place and date of birth

Residence and current address
(if different from residence)

*(please enter full address details
including postcode)*

Details of the relationship
between the Beneficial Owner/s
and the Client *(for example, in case
of natural persons, family/friendship/
work relationships; in case of legal
entities, corporate relationships)*

Identity document

*(please attach a copy and specify
kind of document, issuing authority,
document number, place and date of
issue, expiry date)*

STEP 4

Nature of the transaction

Please provide the following additional information *(Then, go to STEP 5)*

What is the scope and nature of the
transaction?

mandate to sell

purchase mandate

purchase

consulting

other (specify)

The transaction is carried out for
purposes of a personal or commercial
nature?

Personal reasons

Commercial reasons

other (specify)

STEP 5

Politically Exposed Persons ⁶

Are the Client, the Representative and/or the Beneficial Owner/s politically exposed persons?

A. Yes *(please specify who is the Politically Exposed
Person among those listed)*

A.2 No *(go to STEP 6)*

Identification details of politically exposed persons (PEPs)⁶

Identification of the PEP
(please specify who is the Politically
Exposed Person among those listed)

client
representative
beneficial owner

Position of the PEP
(please specify the position leading
to PEP status, e.g. minister, member
of parliament, senator, mayor, etc.)

Origin of the goods covered by the
mandate to sell or of the funds
used to pay for the service

Family asset/s
Asset/s whose ownership has been acquired

employment income
personal savings
inheritance
donation
financing
other (please specify)

STEP 6

I, the undersigned, hereby declare that the information provided in this form is complete and truthful and undertake to notify any changes in such information without delay, either by email or registered letter with return receipt.

Place and date

Legible signature

1 Pursuant to Article 1, paragraph 2, f) of Legislative Decree 231/2007 **a client is:** "the party who establishes ongoing relationships, performs transactions, or requests or receives a professional service following assignment of an appointment". This term must also be considered as applicable, by extension, to the parties in whose name and on whose behalf the transaction is requested.

2 Pursuant to Article 1, paragraph 2, p) of Legislative Decree **a representative is:** "the party authorised to act in the name and on behalf of the client or who is in any case granted powers of representation that allow him/her to act in the name and on behalf of the client".

3 Pursuant to Article 1, paragraph 2, pp) of Legislative Decree 231/2007 **a beneficial owner is:** "the natural person or natural persons, other than the client, in whose interest the ongoing relationship is ultimately established, the professional service is rendered, or the transaction is performed".

4 Pursuant to Article 1, paragraph 2, dd) of Legislative Decree 231/2007, politically exposed persons are: "natural persons who hold, or have ceased to hold, important public offices for less than a year, as well as their family members and those who have well known close connections with the aforesaid parties, as listed below: 1) natural persons who hold or have held important public offices such as: 1.1 in Italy, president of the republic, prime minister, minister, deputy minister and undersecretary, chair of a regional council, regional councillor, mayor of a city designated as the main city of a province or metropolitan city, mayor of a town with a population of at least 15,000 inhabitants; similar offices abroad; 1.2 in Italy, deputy, senator, member of the European parliament, regional councillor; similar positions abroad; 1.3 member of central governing bodies of political parties; 1.4 in Italy, constitutional court judge, magistrate of the Court of Cassation or of the Court of Audit, state councillor, and other members of the Council of Administrative Justice for the Sicilian Region; similar offices abroad; 1.5 member of the governing bodies of central banks and independent authorities; 1.6 in Italy, ambassador, chargé d'affaires, senior officer in the armed forces; similar positions abroad; 1.7 In Italy, member of the governing, management, or supervisory bodies of companies controlled (directly or indirectly) by the Italian State or by a foreign State or whose equity is held, mainly or wholly, by regional councils, the councils of cities designated as the main city of a province and metropolitan cities, the councils of towns with a population of at least 15,000 inhabitants; 1.8 director general of a local branch of the Italian health service or a hospital, university hospital, or other national health service entities. 1.9 director, deputy director, or member of the managing body, or persons with equivalent positions in international organisations; 2) family members of the aforesaid politically exposed persons: parents, spouse, or partner (by civil union or de facto cohabitation or similar institutions) of the politically exposed person, children and their spouse or partner (by civil union or de facto cohabitation or similar institutions); 3) parties with whom the aforesaid politically exposed persons have well known close connections, i.e. 3.1. natural persons who, pursuant to this decree, are beneficial owners, jointly with the politically exposed person, of legal entities, trusts, and similar legal institutions or who have close business relationships with the aforesaid politically exposed persons; 3.2 natural persons who hold merely formal universal control of a known entity which is, in fact, established in the interest and for the benefit of a politically exposed person as stated above".

5 If the Client is a corporation (e.g. a joint-stock company "S.p.A." or a limited liability company "S.r.l."), ownership is indicated by: a) the ownership by a natural person of a stake of more than 25% of the Client's capital (direct ownership); b) the ownership of a stake of more than 25% of the Client's capital, held through subsidiaries, trust companies or intermediaries (indirect ownership). If it is not possible to identify one or more natural persons according to the above indications, the natural person/s who: a) has/have control of the majority of the votes that can be exercised in ordinary shareholders' meetings; b) is/are in a position to exercise a dominant influence: i) by having control of sufficient votes in ordinary shareholders' meetings; ii) by virtue of specific contractual constraints (such as particular by-laws, shareholders' agreements) shall be deemed to be the Beneficial Owner. If the Client is a different private legal entity (partnerships, associations, foundations, trusts ...), the shareholders, founders (if alive), beneficiaries and holders of powers of legal representation, management and administration shall be deemed to be the Beneficial Owner. If it is impossible to unambiguously identify one or more Beneficial Owners in accordance with the foregoing, the natural person/s holding, in accordance with their respective organisational or statutory structures, the powers of legal representation, administration or management of the company (at the head of the Client's chain of control) or of the Client shall be deemed to be the Beneficial Owner.