

INSTRUCTIONS

Processes in detail are:

PROCESS	DESCRIPTION
Issue New LEI	<ol style="list-style-type: none">1. The RA shall inform the LE customer about LEI.2. The RA provides to the LE-AUTHORISED SIGNER <u>InfoCert General Terms and Conditions for LEI Services</u> and <u>Application Form - Request for LEI</u>.3. The RA checks the Application Form reference data.4. The RA - Legal Representative writes an Identity Assertion as check evidence.5. The RA sends to infocertlou@infocert.it the signed Application Form, the signed Identity Assertion and any other supporting documentation.6. InfoCert LOU checks RA documentation, calculates the code, carry out the required verifications, submits LEI and RD into the GLEIF archive and sends the LEI code to the RA.7. The RA receives from InfoCert LOU the LEI code.8. The RA delivers the LEI code to the LE.
Periodically payment	The RA makes the periodically payment to InfoCert LOU, in accordance with InfoCert invoicing process.
Renewals of LEIs	<p>The LEI code has a one year "life-cycle".</p> <ol style="list-style-type: none">1. InfoCert LOU provides to the RA monthly the list of expiring LEI codes (respectively 3 months, 2 months and 1 month before expiration).

	<p>2. The RA informs the LE 3 months, 2 months and 1 month before expiration.</p> <p>3. The RA provides to the LE-AUTHORISED SIGNER <u>InfoCert General Terms and Conditions for LEI Services and Application Form - Request for LEI as a Renewals</u>.</p> <p>The process is the same (Issue New LEI).</p>
Transfer of LEIs and LE-RD inbound	<p>1. The RA receives from the LE customer a Transfer request (from another LOU).</p> <p>2. The RA provides to the LE-AUTHORISED SIGNER <u>InfoCert General Terms and Conditions for LEI Services and Application Form - Transfer for LEI</u>.</p> <p>The process is the same (Issue New LEI).</p>
Transfer of LEIs and LE-RD outbound	<p>InfoCert LOU receives from another LOU a <u>LE customer Transfer Request</u> and informs the RA in 3 Business Days.</p>
Change or Challenge	<p>InfoCert LOU can receives in infocertlou@infocert.it requests for changes or updates or challenge about every RD.</p> <p>The InfoCert LOU Vetting Specialist can investigate the change or challenge contents by means of the official records in the national and/or european business register, in the supervisory registers and lists of the national competent authorities and of the authorities for the supervision of financial markets and in the pension fund registers.</p> <p>The RA is committed to support in these activities the InfoCert LOU Vetting Specialist.</p> <p>The RA is committed to communicate to the LE every change.</p>

In summary, RA's obligations and responsibilities are:

- Provide, correctly fill in and collect InfoCert General Terms and Conditions for LEI Services and Applications Form for issue, transfer and renewal.
- Banks are pursuing a KYC policy (KNOW-YOUR-CUSTOMER) and they comply with Anti Money-Laundering Regulation. In particular, the Directive (Eu) 2015/849 of the European Parliament and of the Council of 20 May 2015 on the prevention of the use of the financial system for the purposes of money laundering or terrorist financing. Customer due diligence measures shall comprise: identifying the customer and verifying the customer's identity on the basis of documents, data or information obtained from a reliable and independent source; assessing and, as appropriate, obtaining information on the purpose and intended nature of the business relationship. Indeed, the reference data collect and sent to InfoCert, as provided for by articles 2 and 3 of Master Agreement, are checked and verified by the Bank, in accordance with KYC policy and Anti Money-Laundering Regulation.
- Provide an Identity Assertion (signed by RA Legal Representative) as check evidence.
- Provide other supporting documentation for 'Level 2' data (LE that have or acquire an LEI report their 'direct accounting consolidating parent' as well as their 'ultimate accounting consolidating parent'):

- Deliver the Lei code to the LE and transmit to the LE any other relevant information on behalf of InfoCert LOU.