the Wolfsberg Group

Financial Institution Name: Location (Country) :

BANQUE FEDERATIVE DU CREDIT MUTUEL (BFCM) FRANCE

The questionnaire is required to be answered on a Legal Entity (LE) Level. The Financial Institution should answer the questionnaire at the legal entity level including any branches for which the client base, products and control model are materially similar to the LE Head Office. This questionnaire should not cover more than one LE. Each question in the CBDDQ will need to be addressed from the perspective of the LE and on behalf of all of its branches. If a response for the LE differs for one of its branches, this needs to be highlighted and details regarding this difference captured at the end of each sub-section. If a branch's business activity (products offered, client base etc.) is materially different than its Entity Head Office, a separate questionnaire can be completed for that branch.

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No#	Question	Answer
	& OWNERSHIP	
1	Full Legal Name	
		BANQUE FEDERATIVE DU CREDIT MUTUEL (BFCM)
2	Append a list of foreign branches which are covered by	
2	this questionnaire	BFCM is the holding company of the group, acts as the central treasury and undertakes capital
	and quodiorniano	and money market activities on behalf of the Group. Please note that due to BFCM specific role,
		answers cover all group entities using BFCM centralized services
3	Full Legal (Registered) Address	
3	Pull Legal (Negistered) Address	4 rue Frederic-Guillaume Raiffeisen
		67000 Strasbourg
		France
4	Full Primary Business Address (if different from above)	
•	. and initially Easthese (in americin norm assert)	
5	Date of Entity incorporation/establishment	
		16/12/1992
6	Select type of ownership and append an ownership chart	
	if available	
6 a	Publicly Traded (25% of shares publicly traded)	No
6 a1	If Y, indicate the exchange traded on and ticker	
	symbol	
6 b	Member Owned/Mutual	Yes
6 c	Government or State Owned by 25% or more	No No
6 d 6 d1	Privately Owned If Y, provide details of shareholders or ultimate	No .
oui	beneficial owners with a holding of 10% or more	
7	% of the Entity's total shares composed of bearer shares	
•	7. Or and Emaily o total ornared composed or search ornared	
		0%
8	Does the Entity, or any of its branches, operate under an	AL.
	Offshore Banking License (OBL)?	No
8 a	If Y, provide the name of the relevant branch/es	
	which operate under an OBL	
9	Does the Bank have a Virtual Bank License or provide	no
10	services only through online channels? Name of primary financial regulator/supervisory authority	
10	internet or primary internet regulator/supervisory authority	
		Autorite de Contrle Prudentiel et de Resolution "ACPR"
11	Provide Legal Entity Identifier (LEI) if available	
		VBHFXSYT7OG62HNT8T76
12	Provide the full legal name of the ultimate parent (if	
- -	different from the Entity completing the DDQ)	
		Caisse Fédérale de Crédit Mutuel
13	Jurisdiction of licensing authority and regulator of	
-	ultimate parent	France
		Autorite de Contrle Prudentiel et de Resolution « ACPR »
14	Select the business areas applicable to the Entity	

14 a	Retail Banking	No
14 b	Private Banking	No
14 c	Commercial Banking	Yes
14 d	Transactional Banking	Yes
14 e	Investment Banking	Yes
14 f	Financial Markets Trading	Yes
14 g	Securities Services/Custody	Yes
14 h	Broker/Dealer	Yes
14 i	Multilateral Development Bank	No
14 j	Wealth Management	No
14 k	Other (please explain)	
15	Does the Entity have a significant (10% or more) portfolio of non-resident customers or does it derive more than 10% of its revenue from non-resident customers? (Non-resident means customers primarily resident in a different jurisdiction to the location where bank services are provided)	No
15 а	If Y, provide the top five countries where the non- resident customers are located.	
16	Select the closest value:	
16 a	Number of employees	10001+
16 b	Total Assets	Greater than \$500 million
17	Confirm that all responses provided in the above Section	
	are representative of all the LE's branches.	Yes
17 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
18	If appropriate, provide any additional information/context to the answers in this section.	Please note that due to BFCM specific role (ref to Q2), answer to Q16 covers all banking entities using BFCM centralized services. Please also note that as an entity, BFCM itself does not have any branches.
2. PRODU	ICTS & SERVICES	
19	Does the Entity offer the following products and services:	
19 a	Correspondent Banking	Yes
19 a1	If Y	
19 a1a	Does the Entity offer Correspondent Banking services to domestic banks?	Yes
19 a1b	Does the Entity allow domestic bank clients to provide downstream relationships?	Yes
19 a1c	Does the Entity have processes and procedures	l
	in place to identify downstream relationships with domestic banks?	Yes
19 a1d		Yes Yes
19 a1d	domestic banks? Does the Entity offer Correspondent Banking	
19 a1e	domestic banks? Does the Entity offer Correspondent Banking services to foreign banks? Does the Entity allow downstream relationships with foreign banks? Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks?	Yes
19 a1e 19 a1f 19 a1g	domestic banks? Does the Entity offer Correspondent Banking services to foreign banks? Does the Entity allow downstream relationships with foreign banks? Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks? Does the Entity offer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTSs)?	Yes Yes Yes
19 a1e	domestic banks? Does the Entity offer Correspondent Banking services to foreign banks? Does the Entity allow downstream relationships with foreign banks? Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks? Does the Entity offer Correspondent Banking services to regulated Money Services Businesses	Yes Yes Yes
19 a1e 19 a1f 19 a1g	domestic banks? Does the Entity offer Correspondent Banking services to foreign banks? Does the Entity allow downstream relationships with foreign banks? Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks? Does the Entity offer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTSs)? Does the Entity allow downstream relationships with MSBs, MVTSs, or Payment Service Provider (PSPs)? MSBs	Yes Yes Yes
19 a1e 19 a1f 19 a1g 19 a1h	domestic banks? Does the Entity offer Correspondent Banking services to foreign banks? Does the Entity allow downstream relationships with foreign banks? Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks? Does the Entity offer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTSs)? Does the Entity allow downstream relationships with MSBs, MVTSs, or Payment Service Provider (PSPs)?	Yes Yes Yes No

		rrespondent banking Due Dingence Questionnaire (CDDDQ) V1.4
19 a1i	Does the Entity have processes and procedures	
	in place to identify downstream relationships with	Yes
	MSBs /MVTSs/PSPs?	
19 b	Cross-Border Bulk Cash Delivery	No
19 c	Cross-Border Remittances	Yes
19 d	Domestic Bulk Cash Delivery	Yes
19 e	Hold Mail	No
19 f		No
19 g	Low Price Securities	No
19 h	Payable Through Accounts	No
19 i	Payment services to non-bank entities who may then	
		Yes
	1 ,1 ,	165
19 i1	If Y , please select all that apply below?	
19 i2	Third Party Payment Service Providers	Yes
19 i3	Virtual Asset Service Providers (VASPs)	No
19 i4	eCommerce Platforms	Yes
19 i5	Other - Please explain	
19 j	Private Banking	Both
19 k	Remote Deposit Capture (RDC)	Yes
19 I	Sponsoring Private ATMs	Yes
	Stored Value Instruments	No No
19 m		
19 n	Trade Finance	Yes
19 o	Virtual Assets	No
19 p	For each of the following please state whether you	
	offer the service to walk-in customers and if so, the	
	applicable level of due diligence:	
19 p1	Check cashing service	No
19 p1a	If yes, state the applicable level of due diligence	
19 p2		No
19 p2a	If yes, state the applicable level of due diligence	
		No
19 p3	Foreign currency conversion	INO
19 p3a	If yes, state the applicable level of due diligence	
19 p3a 19 p4	If yes, state the applicable level of due diligence Sale of Monetary Instruments	No
19 p3a 19 p4 19 p4a	If yes, state the applicable level of due diligence Sale of Monetary Instruments If yes, state the applicable level of due diligence	No
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19 p3a 19 p4 19 p4a 19 p5 19 q 20 20 a 21 22 a 22 b 22 c 22 d 22 e 22 f 22 g 22 h	If yes, state the applicable level of due diligence Sale of Monetary Instruments If yes, state the applicable level of due diligence If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. FF & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting CDD Independent Testing Periodic Review	No N/A Yes Q19k: only domestic remote deposit capture. Please note that due to BFCM specific role (ref to Q2), answer to Q20 covers all banking entities using centralized services. Q19a1b and Q19a1e: Mainly our affiliates. Yes Yes Yes Yes Yes Yes Yes Yes Yes Ye
19 p3a 19 p4 19 p4a 19 p5 19 q 20 20 a 21 22 a 22 b 22 c 22 d 22 e 22 f 22 g 22 h 22 i	If yes, state the applicable level of due diligence Sale of Monetary Instruments If yes, state the applicable level of due diligence If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. FF & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing Periodic Review Policies and Procedures	No N/A Yes Q19k: only domestic remote deposit capture. Please note that due to BFCM specific role (ref to Q2), answer to Q20 covers all banking entities using centralized services. Q19a1b and Q19a1e: Mainly our affiliates. Yes Yes Yes Yes Yes Yes Yes Yes Yes Ye
19 p3a 19 p4 19 p4 19 p4a 19 p5 19 q 20 20 a 21 22 a 22 b 22 c 22 d 22 e 22 f 22 g 22 h 22 i 22 j	If yes, state the applicable level of due diligence Sale of Monetary Instruments If yes, state the applicable level of due diligence If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. FF & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing Periodic Review Policies and Procedures PEP Screening	N/A Yes Q19k: only domestic remote deposit capture. Please note that due to BFCM specific role (ref to Q2), answer to Q20 covers all banking entities using centralized services. Q19a1b and Q19a1e: Mainly our affiliates. Yes Yes Yes Yes Yes Yes Yes Yes Yes Ye
19 p3a 19 p4 19 p4a 19 p5 19 q 20 20 a 21 22 a 22 b 22 c 22 d 22 e 22 f 22 g 22 h 22 i	If yes, state the applicable level of due diligence Sale of Monetary Instruments If yes, state the applicable level of due diligence If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence. Other high-risk products and services identified by the Entity (please specify) Confirm that all responses provided in the above Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. FF & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing Periodic Review Policies and Procedures	No N/A Yes Q19k: only domestic remote deposit capture. Please note that due to BFCM specific role (ref to Q2), answer to Q20 covers all banking entities using centralized services. Q19a1b and Q19a1e: Mainly our affiliates. Yes Yes Yes Yes Yes Yes Yes Yes Yes Ye

00 -	Commissions Ashrika Danishina	lv
22 m	Suspicious Activity Reporting	Yes
22 n	Training and Education	Yes
22 o	Transaction Monitoring	Yes
23	How many full time employees are in the Entity's AML,	101-500
	CTF & Sanctions Compliance Department?	101 000
24	Is the Entity's AML, CTF & Sanctions policy approved at	
	least annually by the Board or equivalent Senior	V
	Management Committee? If N, describe your practice in	Yes
	Question 29.	
25	Does the Board receive, assess, and challenge regular	
	reporting on the status of the AML, CTF, & Sanctions	Yes
	programme?	
26	Does the Entity use third parties to carry out any	
	components of its AML, CTF & Sanctions programme?	No
26 a	If Y, provide further details	
27	Does the entity have a whistleblower policy?	Yes
28	Confirm that all responses provided in the above Section	
20	are representative of all the LE's branches	Yes
28 a	If N, clarify which questions the difference/s relate to	
20 d	and the branch/es that this applies to.	
	and the branonies that this applies to.	
29	If appropriate, provide any additional information/context	Q22b: Adverse media screening is done on a case by case basis. Done systematically for all banking
	to the answers in this section.	customers./Q23: Includes FTE within the Group & dedicated to BFCM.
		Q24: Approval at Crédit Mutuel Group Level.
		Q25: At least annually. In addition, several other updates made to the Group governance bodies.
		was annually. In addition, several other updates made to the Group governance bodies.
4. ANTI BE	RIBERY & CORRUPTION	
30	Has the Entity documented policies and procedures	
	consistent with applicable ABC regulations and	Yes
	requirements to reasonably prevent, detect and report	100
	bribery and corruption?	
31	Does the Entity have an enterprise wide programme that	Yes
	sets minimum ABC standards?	res
32	Has the Entity appointed a designated officer or officers	
	with sufficient experience/expertise responsible for	Yes
	coordinating the ABC programme?	
33	Does the Entity have adequate staff with appropriate	
00	levels of experience/expertise to implement the ABC	Yes
	programme?	
34	Is the Entity's ABC programme applicable to:	Both joint ventures and third parties acting on behalf of the Entity
35	Does the Entity have a global ABC policy that:	Both Joint Ventures and third parties dotting on behalf of the Entity
35 a	Prohibits the giving and receiving of bribes? This	
33 a	includes promising, offering, giving, solicitation or	
	receiving of anything of value, directly or indirectly, if	Yes
	improperly intended to influence action or obtain an	ies
	advantage	
25 6	· ·	
35 b	Includes enhanced requirements regarding	Yes
	interaction with public officials?	
35 c	Includes a prohibition against the falsification of books	
	and records (this may be within the ABC policy or any	Yes
	other policy applicable to the Legal Entity)?	। एउ
36	Does the Entity have controls in place to monitor the	
	effectiveness of their ABC programme?	Yes
37	Does the Board receive, assess, and challenge regular	
· ·	reporting on the status of the ABC programme?	Yes
20		
38	Has the Entity's ABC Enterprise Wide Risk Assessment	
	(EWRA) been completed in the last 12 months?	Yes
38 a	If N, provide the date when the last ABC EWRA was	
	completed.	
20	Does the Entity have an APC residual risk rating that is	
39	Does the Entity have an ABC residual risk rating that is	Voc
	the net result of the controls effectiveness and the inherent risk assessment?	Yes
40		
40	Does the Entity's ABC EWRA cover the inherent risk	
	components detailed below:	
40 a	Potential liability created by intermediaries and other	Yes
	third-party providers as appropriate	
40 b	Corruption risks associated with the countries and	
	industries in which the Entity does business, directly	Yes
	or through intermediaries	
40 c	Transactions, products or services, including those	
	that involve state-owned or state-controlled entities or	Yes
	public officials	

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40 d	Corruption risks associated with gifts and hospitality,	
40 u	hiring/internships, charitable donations and political contributions	Yes
40 e	Changes in business activities that may materially increase the Entity's corruption risk	Yes
41	Does the Entity's internal audit function or other independent third party cover ABC Policies and Procedures?	Yes
42	Does the Entity provide mandatory ABC training to:	
42 a	Board and senior Committee Management	Yes
42 b	1st Line of Defence	Yes
42 c	2nd Line of Defence	Yes
42 d	3rd Line of Defence	Yes
42 e	Third parties to which specific compliance activities subject to ABC risk have been outsourced	No
42 f	Non-employed workers as appropriate (contractors/consultants)	No
43	Does the Entity provide ABC training that is targeted to specific roles, responsibilities and activities?	No
44	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
44 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
45	If appropriate, provide any additional information/context to the answers in this section.	Q42e : Not applicable
C ABAL	CTF & SANCTIONS POLICIES & PROCEDURES	
46	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report:	
46 a	Money laundering	Yes
46 b	Terrorist financing	Yes
46 c	Sanctions violations	Yes
47	Are the Entity's policies and procedures updated at least annually?	Yes
48	Has the Entity chosen to compare its policies and procedures against:	
48 a	U.S. Standards	No
48 a1	If Y, does the Entity retain a record of the results?	
48 b	EU Standards	Yes
48 b1	If Y, does the Entity retain a record of the results?	Yes
49	Does the Entity have policies and procedures that:	
49 a	Prohibit the opening and keeping of anonymous and fictitious named accounts	Yes
49 b	Deskibit the eneminar and because of enemy to fee	
	Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs	Yes
49 c	, , , ,	Yes Yes
49 c 49 d	unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide	
	unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide banking services to unlicensed banks	Yes
49 d	unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit accounts/relationships with shell banks Prohibit dealing with another entity that provides	Yes Yes
49 d 49 e	unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit accounts/relationships with shell banks Prohibit dealing with another entity that provides services to shell banks Prohibit opening and keeping of accounts for Section	Yes Yes Yes

	Wolfsberg Group Co	
49 i	Define the process for escalating financial crime risk	
	issues/potentially suspicious activity identified by	Yes
49 j	employees Define the process, where appropriate, for	
40)	terminating existing customer relationships due to	Yes
	financial crime risk	
49 k	Define the process for exiting clients for financial	
	crime reasons that applies across the entity, including	Yes
	foreign branches and affiliates	
49 I	Define the process and controls to identify and handle customers that were previously exited for financial	
	crime reasons if they seek to re-establish a	Yes
	relationship	
49 m	Outline the processes regarding screening for	
	sanctions, PEPs and Adverse Media/Negative News	Yes
49 n	Outline the processes for the maintenance of internal	Yes
	"watchlists"	Yes
50	Has the Entity defined a risk tolerance statement or	N.
	similar document which defines a risk boundary around their business?	Yes
51	Does the Entity have record retention procedures that	
	comply with applicable laws?	Yes
51 a	If Y, what is the retention period?	
		5 years or more
		5 years or more
52	Confirm that all responses provided in the above Section	Yes
F2 o	are representative of all the LE's branches If N, clarify which questions the difference/s relate to	
52 a	and the branch/es that this applies to.	
	and the branen, so that the applies to.	
53	If appropriate, provide any additional information/context	
	to the answers in this section.	
6. AML, CT	F & SANCTIONS RISK ASSESSMENT	
54	Dana the Cretical ANAL & CTC CV/DA account to internet	
	Does the Entity's AML & CTF EWRA cover the inherent	
	risk components detailed below:	
54 a	risk components detailed below: Client	Yes
54 b	risk components detailed below: Client Product	Yes
	risk components detailed below: Client	
54 b 54 c	risk components detailed below: Client Product Channel	Yes Yes
54 b 54 c 54 d 55	risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below:	Yes Yes Yes
54 b 54 c 54 d 55	risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring	Yes Yes Yes Yes Yes
54 b 54 c 54 d 55 55 a 55 b	risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence	Yes Yes Yes Yes Yes Yes
54 b 54 c 54 d 55	risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring	Yes Yes Yes Yes Yes
54 b 54 c 54 d 55 55 a 55 b 55 c	risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification	Yes
54 b 54 c 54 d 55 55 a 55 b 55 c 55 c 55 d 55 e	risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News	Yes
54 b 54 c 54 d 55 55 a 55 b 55 c 55 d 55 e	risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education	Yes
54 b 54 c 54 d 55 55 a 55 b 55 c 55 d 55 e 55 f 55 g	risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance	Yes
54 b 54 c 54 d 55 55 a 55 b 55 c 55 d 55 e 55 f 55 g 55 h	risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information	Yes
54 b 54 c 54 d 55 55 a 55 b 55 c 55 d 55 e 55 f 55 g	risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance	Yes
54 b 54 c 54 d 55 55 a 55 b 55 c 55 d 55 e 55 f 55 g 55 h	risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF	Yes
54 b 54 c 54 d 55 55 a 55 a 55 b 55 c 55 c 55 c 55 f 55 g 55 h 56	risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months?	Yes
54 b 54 c 54 d 55 55 a 55 a 55 b 55 c 55 c 55 c 55 f 55 g 55 h 56	risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF	Yes
54 b 54 c 54 d 55 55 a 55 b 55 c 55 d 55 e 55 f 55 g 56 h 56	risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed.	Yes
54 b 54 c 54 d 55 55 a 55 a 55 b 55 c 55 c 55 c 55 f 55 g 55 h 56	risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed.	Yes
54 b 54 c 54 d 55 55 a 55 b 55 c 55 d 55 e 55 f 55 g 55 h 56 56 a	risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below:	Yes
54 b 54 c 54 d 55 55 a 55 a 55 b 55 c 55 c 55 f 55 g 55 h 56 56 a	risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client	Yes
54 b 54 c 54 d 55 a 55 a 55 b 55 c 55 d 55 c 55 f 55 g 55 h 56 a 57 a 57 a	risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below:	Yes
54 b 54 c 54 d 55 55 a 55 a 55 b 55 c 55 c 55 f 55 g 55 h 56 56 a	risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product	Yes
54 b 54 c 54 d 55 55 a 55 a 55 b 55 c 55 d 55 c 55 f 55 g 55 h 56 56 a	risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls	Yes
54 b 54 c 54 d 55 a 55 a 55 b 55 c 55 c 55 f 55 g 55 h 56 a 57 a 57 a 57 c 57 d 58	risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below:	Yes
54 b 54 c 54 d 55 a 55 a 55 b 55 c 55 d 55 e 55 f 55 g 55 h 56 a 57 a 57 a 57 c 57 d 58 a	risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: Customer Due Diligence	Yes
54 b 54 c 54 d 55 55 a 55 a 55 b 55 c 55 d 55 c 55 f 55 g 55 h 56 56 a 57 57 a 57 b 57 c 57 d 58 58 a 58 a	risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: Customer Due Diligence Governance	Yes
54 b 54 c 54 d 55 55 a 55 a 55 b 55 c 55 d 55 f 55 g 55 h 56 57 57 a 57 c 57 d 58	risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: Customer Due Diligence	Yes

Size of Marino Screening Yes 1		T	
Section Territory and Education Yes Yes Section Yes Yes Section Yes Yes Section Yes	58 e		
Has the Emily Sanctons EWRA been completed in the last Sanctions EWRA was completed.	58 f	Transaction Screening	Yes
Has the Emily Sanctons EWRA been completed in the last Sanctions EWRA was completed.	58 a	Training and Education	Yes
list 12 morths? Post			
### Section of the date when the last Senctions EWRA was completed. ### Confirm that all responses provided in the above Section of all the LE's beneficial sections of all the LE's beneficial sections of the provided in the above Section of the provided any additional information-context to the account of the branchies that this applies to. #### Confirm that all responses provided in the above Section of the provided any additional information-context to the account of the branchies that this applies to. ###################################	••		Yes
was completed. Confirm that all responses provided in the above Section are representative of all the LE's transmiss. If a propositive provide any additional information/context to the anowers in this section. If appropriate, provide any additional information/context to the anowers in this section. See For example, for banks, corporate customers, private banking. 7. KYC, CDD and EDD. 2. Once the Entry writy the identity of the customer? 2. Once the Entry writy the identity of the customer? 3. Once the Entry writy the identity of the customer? 4. Once the Entry writy the Entry gether and retarn vice of the customers or white t	50 a		
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are representative of all the LES branches 8 a File (Left) which questions the difference largetes to and the branchines that the applies to. 8 Fappropriate, provide any additional information/context to the amovement in this acction. 8 Fappropriate, provide any additional information/context to the amovement in this acction. 8 For example, for banks, corporate auctionses, private bunking. 8 Description of the Entity verify the identity of the oustomer? 9 Description of the Entity profess and procedures set out when CDD use the completed, got the time of brothading or within 30 diagra. 9 Which of the time of the state of the s		was completed.	
are representative of all the LE's branches 60 a File Audiny which question the difference in education			
are representative of all the LE's branches 60 a File Audiny which question the difference in education			
are representative of all the LES branches 8 a File (Left) which questions the difference largetes to and the branchines that the applies to. 8 Fappropriate, provide any additional information/context to the amovement in this acction. 8 Fappropriate, provide any additional information/context to the amovement in this acction. 8 For example, for banks, corporate auctionses, private bunking. 8 Description of the Entity verify the identity of the oustomer? 9 Description of the Entity profess and procedures set out when CDD use the completed, got the time of brothading or within 30 diagra. 9 Which of the time of the state of the s	60	Confirm that all responses provided in the above Section	
60 a direction to the branchies that this applies to and the branchies that this applies to and the branchies that this applies to be an awayers in this section. 61 If appropriate, provide any additional information/context to the awayers in this section. 62 Ones the Etility verify the identity of the colored coutomers, private branking. 63 Ones the Etility verify the identity of the colored coutomers, private branking. 64 Ones the Etility verify the identity of the colored coutomers, private branking. 65 Ones the Etility verify the identity of the colored coutomers, private branking. 66 Which of the following does the Entity galter and retain when conducting COD's Select all that apply: 66 Under the Colored training of the Colored training when conducting COD's Select all that apply: 66 C. Nature of funders branking the Colored training of the Colored training the Colored training the Colored training training the Colored training tra	00		Yes
and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. See: For example, for banks, corporate customers, private banking. 7. KYC, CDD and EDD 2. Does the Entity verify the identity of the customer? Yes 3. Do the Entity's protices and procedures set out when CDD must be completed, e.g. at the time of orbicoeffing yes 6. Which of the following beat the Entity against an erical when conducting CDD? Select all that apply. 6. A Contract of the Colorina of the Entity against an erical when conducting CDD? Select all that apply. 6. Nature of business/lenblyment	<u> </u>		
61 flappropriate, provide any additional information/context to the answers in this section. 55e For example, for banks, corporate customers, private banking. 62 Ose the Entity serify the identity of the customer? 63 Os the Entity spolicies and procedures set out when CDD must be completed, og, at the time of conboarding or within 30 days? 64 Which of the following does the Entity gather and retain with the customers of the spoke	ьи а		
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C. KYC, CDD and EDD		to the answers in this section.	55e: For example, for banks, corporate
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64 b		when conducting CDD? Select all that apply:	
64 b	64 a		Yes
Section Sect			
64 d			
64 o			
Surge of funds			
Source of wealth			
Source of wealth Source of w			
Are each of the following identified: Sa			
Sa			Yes
Section	65		
Second	65 a	Ultimate beneficial ownership	Yes
Second Content	65 a1	Are ultimate beneficial owners verified?	Yes
Second Content	65 b	Authorised signatories (where applicable)	Yes
65 d Other relevant parties 66 What is the Entity's minimum (lowest) threshold applied to beneficial ownership identification? 67 Does the due diligence process result in customers receiving a risk classification? 68 If Y, what factors/criteria are used to determine the customer's risk classification? Select all that apply: 69 at Product Usage 67 a2 Geography 67 a3 Business Type/Industry 68 a3 Business Type/Industry 68 a4 Legal Entity type 69 a5 Adverse Information 68 a6 If Y, is this at: 68 a If Y, is this at: 68 a1 Onboarding 68 a2 KYC renewal 68 a3 Trigger event 68 a4 Other 68 a4 Other 68 a5 Does the Entity have a risk based approach to screening customers for Adverse Media/Negative News? 69 a1 If Y, is this at: 69 Does the Entity have a risk based approach to screening customers for Adverse Media/Negative News? 69 a1 If Y, is this at: 69 a If Y, is this at:	65 c		Yes
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69 a If Y, is this at: 69 a1 Onboarding Yes	9		
69 a1 Onboarding Yes		customers for Adverse Media/Negative News?	Yes
69 a1 Onboarding Yes			
	69 a		
	69 a1		Yes
	69 a2	KYC renewal	Yes

69 a3	Trigger event	Yes
70	What is the method used by the Entity to screen for	Manual
-	Adverse Media/Negative News?	Manual
71	Does the Entity have a risk based approach to screening	
71		
	customers and connected parties to determine whether	Yes
	they are PEPs, or controlled by PEPs?	
71 a	If Y, is this at:	
71 a1	Onboarding	Yes
71 a2	KYC renewal	Yes
71 a3	Trigger event	Yes
72	What is the method used by the Entity to screen PEPs?	
		Combination of automated and manual
	D 4 5 6 1	
73	Does the Entity have policies, procedures and processes	
	to review and escalate potential matches from screening	
	customers and connected parties to determine whether	Yes
	they are PEPs, or controlled by PEPs?	
	, ,	
	1-10/0	
74	Is KYC renewed at defined frequencies based on risk	Yes
	rating (Periodic Reviews)?	
74 a	If yes, select all that apply:	
74 a1	Less than one year	No
74 a2	1 – 2 years	Yes
	3 – 4 years	Yes
74 a3		
74 a4	5 years or more	Yes
74 a5	Trigger-based or perpetual monitoring reviews	Yes
74 a6	Other (Please specify)	
	· · ·	
75	Does the Entity maintain and report metrics on current	
. •	and past periodic or trigger event due diligence reviews?	Von
	and past periodic of trigger event due diligence reviews?	res
76	From the list below, which categories of customers or	
	industries are subject to EDD and/or are restricted, or	
	prohibited by the Entity's FCC programme?	
76 a	Arms, defence, military	Always subject to EDD
76 b	Respondent Banks	Always subject to EDD
76 b1	If EDD or restricted, does the EDD assessment	
,001	contain the elements as set out in the Wolfsberg	Vos
		Yes
	Correspondent Banking Principles 2022?	
76 c	Embassies/Consulates	Restricted
76 d	Extractive industries	Restricted
76 e	Gambling customers	Restricted
76 f	General Trading Companies	Always subject to EDD
	Marijuana-related Entities	Prohibited
76 g		
76 h	MSB/MVTS customers	Prohibited
76 i	Non-account customers	Prohibited
76 j	Non-Government Organisations	EDD on risk-based approach
76 k	Non-resident customers	EDD on risk-based approach
76 I	Nuclear power	Always subject to EDD
76 m	Payment Service Providers	Always subject to EDD
	-	
76 n	PEPs	Always subject to EDD
76 o	PEP Close Associates	Always subject to EDD
76 p	PEP Related	Always subject to EDD
76 q	Precious metals and stones	Always subject to EDD
76 r	Red light businesses/Adult entertainment	Prohibited
76 s	Regulated charities	EDD on risk-based approach
76 t	Shell banks	Prohibited FDD and the based on
76 u	Travel and Tour Companies	EDD on risk-based approach
76 v	Unregulated charities	Prohibited
76 w	Used Car Dealers	EDD on risk-based approach
76 x	Virtual Asset Service Providers	Prohibited
76 y	Other (specify)	
,	Canal (openit)	Prohibited ; Sects, Astrology, Animal Selling business apart from certified animal selling
		businesses, Illegal businesses of images, documents, softwares, applications, commercialisation of
		fraudulent investments, crowfunding platforms apart from public interest crowfunding platforms.
	16	
77	If restricted, provide details of the restriction	
		We may refuse to enter into relationship with any client on a case by case basis or according to
		exclusion by default. Other categories with restricted approach: Airline, Maritime, Road transport,
		Hydrocarbons, coal, mining, civil nuclear energy, agriculture, defense and security sectors.
78	Does EDD require senior business management and/or	V
-	compliance approval?	Yes

	<u>_</u>	Mespondent Banking Due Bingence Questionnaire (CBBDQ) V1.4
78 a	If Y indicate who provides the approval:	Both
79	Does the Entity have specific procedures for onboarding	
	entities that handle client money such as lawyers,	Yes
90	accountants, consultants, real estate agents?	
80	Does the Entity perform an additional control or quality review on clients subject to EDD?	Yes
81	Confirm that all responses provided in the above Section	
	are representative of all the LE's branches	No branches
81 a	If N, clarify which questions the difference/s relate to	
	and the branch/es that this applies to	
00	If a manufacture and the second secon	
82	If appropriate, provide any additional information/context to the answers in this section.	Q66 : Depends of the customer activities, products and locations: 10% or 25%.
	to the allowers in this section.	Q67a5 : For example, for banks, corporate customers, private banking Q70 : An IT project is in progress concerning the automated screening.
		Q70 : An IT project is in progress concerning the automated screening. Q72 : The entire client database is entirely screened daily.
o MONT	ODING & REPORTING	W. Z The offine offerit database is critically solection daily.
83	ORING & REPORTING Does the Entity have risk based policies, procedures and	
55	monitoring processes for the identification and reporting	Yes
	of suspicious activity?	
84	What is the method used by the Entity to monitor	Combination of automated and manual
94.0	transactions for suspicious activities?	
84 a	If manual or combination selected, specify what type of transactions are monitored manually	
	or dansactions are monitored manually	Automated controls may be complemented by manual controls, as if and when, required by procedures.
		procedures.
84 b	If automated or combination selected, are internal	
	system or vendor-sourced tools used?	Both
84 b1	If 'Vendor-sourced tool' or 'Both' selected, what is	
	the name of the vendor/tool?	Internal + IBM
		internal · iDivi
84 b2	When was the tool last updated?	< 1 year
84 b3	When was the automated Transaction Monitoring	< 1 year
85	application last calibrated? Does the Entity have regulatory requirements to report	
30	suspicious transactions?	Yes
85 a	If Y, does the Entity have policies, procedures and	
	processes to comply with suspicious transaction	Yes
00	reporting requirements?	
86	Does the Entity have policies, procedures and processes to review and escalate matters arising from the	Yes
	monitoring of customer transactions and activity?	। তে
87	Does the Entity have a data quality management	
•	programme to ensure that complete data for all	Yes
	transactions are subject to monitoring?	
88	Does the Entity have processes in place to respond to	V _a .
	Request For Information (RFIs) from other entities in a timely manner?	Yes
89	Does the Entity have processes in place to send	
	Requests for Information (RFIs) to their customers in a	Yes
	timely manner?	
90	Confirm that all responses provided in the above Section	No branches
90 a	are representative of all the LE's branches If N, clarify which questions the difference/s relate to	
JU a	and the branch/es that this applies to	
	are present and applied to	
91	If appropriate, provide any additional information/context	
	to the answers in this section.	
9. PAYME	ENT TRANSPARENCY	
92	Does the Entity adhere to the Wolfsberg Group Payment	Yes
	Transparency Standards?	100

93	Does the Entity have policies, procedures and processes	
	to comply with and have controls in place to ensure	
	compliance with:	
93 a	FATF Recommendation 16	Yes
93 b	Local Regulations	Yes
93 b1	If Y, specify the regulation	
		EU 2015/847 Regulation notably
93 c	If N, explain	
94	Does the Entity have controls to support the inclusion of required and accurate originator information in cross border payment messages?	Yes
95	Does the Entity have controls to support the inclusion of required beneficiary information cross-border payment messages?	Yes
95 a	If Y, does the Entity have procedures to include beneficiary address including country in cross border payments?	Yes
96	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
96 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
07	If appropriate provide any additional information is	
97	If appropriate, provide any additional information/context to the answers in this section.	
	to the answers in this section.	Q95a: Beneficiary country is mandatory.
10. SANC	TIONS	
98	Does the Entity have a Sanctions Policy approved by	
	management regarding compliance with sanctions law applicable to the Entity, including with respect to its business conducted with, or through accounts held at foreign financial institutions?	Yes
99	Does the Entity have policies, procedures, or other	
	controls reasonably designed to prevent the use of another entity's accounts or services in a manner causing the other entity to violate sanctions prohibitions applicable to the other entity (including prohibitions within the other entity's local jurisdiction)?	Yes
100	Does the Entity have policies, procedures or other controls reasonably designed to prohibit and/or detect actions taken to evade applicable sanctions prohibitions, such as stripping, or the resubmission and/or masking, of sanctions relevant information in cross border transactions?	Yes
101	Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists?	Yes
102	What is the method used by the Entity for sanctions	Both Automated and Manual
102 a	screening? If 'automated' or 'both automated and manual'	
102 a1	selected: Are internal system of vendor-sourced tools used?	Vendor-sourced tools
102 a1 102 a1a	If a 'vendor-sourced tool' or 'both' selected.	VOINGOI-SOULOGU LOUIS
.02 010	what is the name of the vendor/tool?	Uniserv
102 a2	When did you last test the effectiveness (of finding true matches) and completeness (lack of missing data) of the matching configuration of the automated tool? (If 'Other' please explain in Question 110)	< 1 year
103	Does the Entity screen all sanctions relevant data, including at a minimum, entity and location information, contained in cross border transactions against Sanctions Lists?	Yes
104	What is the method used by the Entity?	Combination of automated and manual
105	Does the Entity have a data quality management programme to ensure that complete data for all transactions are subject to sanctions screening?	Yes
106	Select the Sanctions Lists used by the Entity in its	
106 a	sanctions screening processes: Consolidated United Nations Security Council	
וטט מ	Sanctions List (UN)	Used for screening customers and beneficial owners and for filtering transactional data
	\-··/	<u> </u>

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106 b	United States Department of the Treasury's Office of Foreign Assets Control (OFAC)	Used for screening customers and beneficial owners and for filtering transactional data
106 с	Office of Financial Sanctions Implementation HMT (OFSI)	Used for screening customers and beneficial owners and for filtering transactional data
106 d	European Union Consolidated List (EU)	Used for screening customers and beneficial owners and for filtering transactional data
106 e	Lists maintained by other G7 member countries	Used for screening customers and beneficial owners and for filtering transactional data
106 f	Other (specify)	
		BFCM applies the Crédit Mutuel Alliance Fédérale common set of list, which includes all lists of those countries in wich the group operates.
107	When regulatory authorities make updates to their Sanctions list, how many business days before the entity updates their active manual and/or automated screening systems against:	
107 a	Customer Data	Same day to 2 business days
107 b	Transactions	Same day to 2 business days
108	Does the Entity have a physical presence, e.g. branches, subsidiaries, or representative offices located in countries/regions against which UN, OFAC, OFSI, EU or G7 member countries have enacted comprehensive jurisdiction-based Sanctions?	No
109	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
109 а	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
110	If appropriate, provide any additional information/context to the answers in this section.	
11. TRAINI	NG & EDUCATION	
111	Does the Entity provide mandatory training, which includes:	
111 a	Identification and reporting of transactions to government authorities	Yes
111 b	Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered	Yes
111 c	Internal policies for controlling money laundering, terrorist financing and sanctions violations	Yes
111 d	New issues that occur in the market, e.g. significant regulatory actions or new regulations	Yes
111 e	Conduct and Culture	Yes
111 f	Fraud	Yes
112	Is the above mandatory training provided to :	
112 a	Board and Senior Committee Management	Yes
112 b	1st Line of Defence	Yes
112 c	2nd Line of Defence	Yes
112 d	3rd Line of Defence	Yes
112 e	Third parties to which specific FCC activities have been outsourced	Not Applicable
112 f	Non-employed workers (contractors/consultants)	No
113	Does the Entity provide AML, CTF & Sanctions training that is targeted to specific roles, responsibilities and high risk products, services and activities?	Yes
114	Does the Entity provide customised training for AML, CTF and Sanctions staff?	Yes
114 a	If Y, how frequently is training delivered?	Annually
115	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
	·	

115 a	If N, clarify which questions the difference/s relate to	
	and the branch/es that this applies to.	
116	If appropriate, provide any additional information/context	
	to the answers in this section.	112f : please note that the entity does not outsource any process or sub process in relation to KYC or transaction monitoring and therefore does not work with any non-employed workers in relation
		to AML processes.
40 OHALITY	/ ACCUIDANCE (COMPLIANCE TECTING	
117	Y ASSURANCE /COMPLIANCE TESTING Does the Entity have a program wide risk based Quality	
117	Assurance programme for financial crime (separate from	Yes
	the independent Audit function)?	
118	Does the Entity have a program wide risk based Compliance Testing process (separate from the	Yes
	independent Audit function)?	
119	Confirm that all responses provided in the above Section	Yes
119 a	are representative of all the LE's branches If N, clarify which questions the difference/s relate to	
110 4	and the branch/es that this applies to.	
120	If appropriate, provide any additional information/context to the answers in this section.	
	to the allowers in this Section.	
13. AUDIT		
121	In addition to inspections by the government	
	supervisors/regulators, does the Entity have an internal audit function, a testing function or other independent	
	third party, or both, that assesses FCC AML, CTF, ABC,	Yes
	Fraud and Sanctions policies and practices on a regular	
122	basis? How often is the Entity audited on its AML, CTF, ABC,	
122	Fraud and Sanctions programme by the following:	
122 a	Internal Audit Department	Yearly
122 b	External Third Party	Component based reviews
123	Does the internal audit function or other independent third party cover the following areas:	
123 a	AML, CTF, ABC, Fraud and Sanctions policy and	Yes
123 b	procedures Enterprise Wide Risk Assessment	Yes
123 c	Governance	Yes
123 d	KYC/CDD/EDD and underlying methodologies	Yes
123 e 123 f	Name Screening & List Management Reporting/Metrics & Management Information	Yes Yes
123 g	Suspicious Activity Filing	Yes
123 h	Technology	Yes
123 i 123 j	Transaction Monitoring Transaction Screening including for sanctions	Yes Yes
123 j	Training & Education	Yes
123 I	Other (specify)	
124	Are adverse findings from internal & external audit	
	tracked to completion and assessed for adequacy and	Yes
125	completeness? Confirm that all responses provided in the above section	
125	are representative of all the LE's branches	Yes
125 a	If N, clarify which questions the difference/s relate to	
	and the branch/es that this applies to.	
126	If appropriate, provide any additional information/context	
120	to the answers in this section.	
14. FRAUD		
127	Does the Entity have policies in place addressing fraud risk?	Yes
128	Does the Entity have a dedicated team responsible for	Yes

129	Does the Entity have real time monitoring to detect fraud?	Yes
130	Do the Entity's processes include gathering additional information to support its fraud controls, for example: IP address, GPS location, and/or device ID?	Yes
131	Confirm that all responses provided in the above section are representative of all the LE's branches	Yes
131 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
132	If appropriate, provide any additional information/context to the answers in this section.	BFCM is included in the Crédit Mutuel Alliance Fédérale fraud monitoring and management framework.

Declaration Statement

Wolfsberg Group Correspondent Banking Due Diligence Questionnaire 2023 (CBDDQ V1.4)
Declaration Statement (To be signed by Global Head of Correspondent Banking or equivalent position holder AND Group Money Laundering Prevention Officer, Global Head of Anti- Money Laundering,
Chief Compliance Officer, Global Head of Financial Crimes Compliance OR equivalent)

Banque Fédérative du Crédit Mutuel_(BFCM)_ _ (Financial Institution name) is fully committed to the fight against financial crime and makes every effort to remain in full compliance with all applicable financial crime laws, regulations and standards in all of the jurisdictions in which it does business and holds accounts.

The Financial Institution understands the critical importance of having effective and sustainable controls to combat financial crime in order to protect its reputation and to meet its legal and regulatory

The Financial Institution recognises the importance of transparency regarding parties to transactions in international payments and has adopted/is committed to adopting these standards.

The Financial Institution further certifies it complies with / is working to comply with the Wolfsberg Correspondent Banking Principles and the Wolfsberg Trade Finance Principles. The information provided in this Wolfsberg CBDDQ will be kept current and will be updated no less frequently than every eighteen months.

The Financial Institution commits to file accurate supplemental information on a timely basis.

(Global Head of Correspondent Banking or equivalent), certify that I have read and understood this declaration, that the answers provided in I, _François DILLY this Wolfsberg CBDDQ are complete and correct to my honest belief, and that I am authorised to execute this declaration on behalf of the Financial Institution.

Pierre-Yves LE BORGNE (Group Head of Financial Crime Compliance), certify that I have read and understood this declaration, that the answers provided in this Wolfsberg CBDDQ are complete and correct to my honest belief, and that I am authorised to execute this declaration on behalf of the Financial Institution.

22 January 2025 (Signature & Date)

(Signature & Date) 22 January 2025