

Financial Institution Name: Location (Country) : Banque Fédérative du Crédit Mutuel (BFCM) France

No #	Question	Answer
	TITY & OWNERSHIP	
1. LIN		Panaua Fádárativa du Crádit Mutual (RECNA)
2	Full Legal name Append a list of foreign branches which are covered by this questionnaire (if applicable)	Banque Fédérative du Crédit Mutuel (BFCM) BFCM is the holding company of Crédit Mutuel Alliance Fédérale group, acts as the central treasury and undertakes capital 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	4 rue Frédéric-Guillaume Raiffeisen 67000 Strasbourg France
4	Full Primary Business Address (if different from above)	
5	Date of Entity incorporation/establishment	16/12/1992
6	Select type of ownership and append an ownership chart if available	
6 a 6 a1	Publicly Traded (25% of shares publicly traded)	No
6 b	Member Owned/Mutual	Yes
6 c	Government or State Owned by 25% or more	No
6 d	Privately Owned	No
6 d1	If Y, provide details of shareholders or ultimate beneficial owners with a holding of 10% or more	
7	% of the Entity's total shares composed of bearer shares	0%
8	Does the Entity, or any of its branches, operate under an Offshore Banking License (OBL) ?	Νο
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 services only through online channels?	Νο
10	Provide Legal Entity Identifier (LEI) if available	VBHFXSYT7OG62HNT8T76
2. AN	IL, CTF & SANCTIONS PROGRAMME	
11	Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:	
11 a	Appointed Officer with sufficient experience/expertise	Yes
11 b	Adverse Information Screening	Yes
11 c	Beneficial Ownership	Yes
11 d	Cash Reporting	Yes
11 e	CDD	Yes
11 f	EDD	Yes
11 g	Independent Testing	Yes
11 h	Periodic Review	Yes
11 i	Policies and Procedures	Yes
11 j 11 k	PEP Screening Bick According	Yes Yes
11 K 11 I	Risk Assessment Sanctions	Yes
11 n	Suspicious Activity Reporting	Yes
11 m 11 n	Training and Education	Yes
11 n 11 o	Transaction Monitoring	Yes
12	Is the Entity's AML, CTF & Sanctions policy approved at least annually by the Board or equivalent Senior Management Committee?	
13	Does the Entity use third parties to carry out any components of its AML, CTF & Sanctions programme?	Νο
13 a	If Y, provide further details	
14	Does the entity have a whistleblower policy?	Yes
<b>-</b>		

5. AI	ITI BRIBERY & CORRUPTION	
	Has the Entity documented policies and procedures	
15	consistent with applicable ABC regulations and	Yes
	requirements to prevent, detect and report bribery	
<b> </b>	and corruption?	
	Does the Entity's internal audit function or other	
16	independent third party cover ABC Policies and	Yes
47	Procedures?	
17	Does the Entity provide mandatory ABC training to:	Vec
17 a	Board and Senior Committee Management	Yes
17 b	1st Line of Defence	Yes
17 c	2nd Line of Defence 3rd Line of Defence	Yes
17 d		res
17 e	Third parties to which specific compliance activities	Not Applicable
	subject to ABC risk have been outsourced	
17 f	Non-employed workers as appropriate (contractors/consultants)	No
<u>Λ</u> ΔΔ	/L, CTF & SANCTIONS POLICIES & PROCEDURES	
<b>4.</b> AN		
	Has the Entity documented policies and procedures	
18	consistent with applicable AML, CTF & Sanctions	
	regulations and requirements to reasonably prevent,	
18 a	detect and report:	Yes
	Money laundering	Yes
18 b 18 c	Terrorist financing Sanctions violations	Yes
18 C 19		res
1.9	Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and	
19 a	fictitious named accounts	Yes
<b> </b>	Prohibit the opening and keeping of accounts for	
19 b	unlicensed banks and/or NBFIs	Yes
<b>├</b> ──	Prohibit dealing with other entities that provide	
19 c	banking services to unlicensed banks	Yes
19 d	Prohibit accounts/relationships with shell banks	Yes
	Prohibit dealing with another Entity that provides	
19 e	services to shell banks	Yes
	Prohibit opening and keeping of accounts for Section	
19 f	311 designated entities	Yes
	Prohibit opening and keeping of accounts for any of	
	unlicensed/unregulated remittance agents,	
19 g	exchanges houses, casa de cambio, bureaux de	Yes
1	change or money transfer agents	
	Assess the risks of relationships with domestic and	
19 h	foreign PEPs, including their family and close	Yes
1	associates	
	Define the process for escalating financial crime risk	
19 i	issues/potentially suspicious activity identified by	Yes
	employees	
10 :	Outline the processes regarding screening for	Yes
19 j	sanctions, PEPs and negative media	Yes
	Has the Entity defined a risk tolerance statement or	
20	similar document which defines a risk boundary	Yes
	around their business?	
21	Does the Entity have record retention procedures that	Yes
<b>Z</b> 1	comply with applicable laws?	
<b>21</b> a	If Y, what is the retention period?	5 years or more
5. KY	C, CDD and EDD	
22	Does the Entity verify the identity of the customer?	Yes
	Do the Entity's policies and procedures set out when	
23	CDD must be completed, e.g. at the time of	Yes
	onboarding or within 30 days?	
2.4	Which of the following does the Entity gather and	
24	retain when conducting CDD? Select all that apply:	
24 a	Customer identification	Yes
24 b	Expected activity	Yes
24 с	Nature of business/employment	Yes
24 d	Ownership structure	Yes
24 e	Product usage	Yes

24 f	Purpose and nature of relationship	Yes
24 g	Source of funds	Yes
24 h	Source of wealth	Yes
25	Are each of the following identified:	
25 a	Ultimate beneficial ownership	Yes
25 a1	Are ultimate beneficial owners verified?	Yes
25 b	Authorised signatories (where applicable)	Yes
25 с	Key controllers	Yes
25 d	Other relevant parties	
20	Does the due diligence process result in customers	Vaa
26	receiving a risk classification?	Yes
	Does the Entity have a risk based approach to	
	screening customers and connected parties to	
27	determine whether they are PEPs, or controlled by	Yes
	PEPs?	
	Does the Entity have policies, procedures and	
	processes to review and escalate potential matches	
28	from screening customers and connected parties to	Yes
	determine whether they are PEPs, or controlled by	
	PEPs?	
	Is KYC renewed at defined frequencies based on risk	
29	rating (Periodic Reviews)?	Yes
29 a	If yes, select all that apply:	
29 a 29 a1		No
29 a1 29 a2	Less than one year	Yes
29 a2 29 a3	1-2 years	Yes
29 a5 29 a4	3 – 4 years	Yes
	5 years or more	Yes
29 a5 29 a6	Trigger-based or perpetual monitoring reviews Other	
29 80		
20	From the list below, which categories of customers or	
30	industries are subject to EDD and/or are restricted, or	
20	prohibited by the Entity's FCC programme?	
30 a	Arms, Defence, Military Correspondent Banks	Always subject to EDD Always subject to EDD
30 b	Lorrespondent Banks	
		Always subject to EDD
	If EDD or EDD & restricted, does the EDD	Always subject to EDD
		Yes
30 b1	If EDD or EDD & restricted, does the EDD assessment contain the elements as set out in the	
30 b1	If EDD or EDD & restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022?	Yes
30 b1 30 c	If EDD or EDD & restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022? Embassies/Consulates	Yes Restricted
30 b1 30 c 30 d	If EDD or EDD & restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022? Embassies/Consulates Extractive industries	Yes Restricted Restricted
30 b1 30 c 30 d 30 e	If EDD or EDD & restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022? Embassies/Consulates Extractive industries Gambling customers	Yes Restricted Restricted Restricted
30 b1 30 c 30 d	If EDD or EDD & restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022? Embassies/Consulates Extractive industries Gambling customers General Trading Companies	Yes Restricted Restricted Restricted Always subject to EDD
30 b1 30 c 30 d 30 e	If EDD or EDD & restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022? Embassies/Consulates Extractive industries Gambling customers General Trading Companies Marijuana-related Entities	Yes Restricted Restricted Restricted Always subject to EDD Prohibited
30 b1 30 c 30 d 30 e 30 f	If EDD or EDD & restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022? Embassies/Consulates Extractive industries Gambling customers General Trading Companies	Yes Restricted Restricted Restricted Always subject to EDD
30 b1 30 c 30 d 30 e 30 f 30 g	If EDD or EDD & restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022? Embassies/Consulates Extractive industries Gambling customers General Trading Companies Marijuana-related Entities	Yes Restricted Restricted Restricted Always subject to EDD Prohibited
30 b1 30 c 30 d 30 e 30 f 30 g 30 h	If EDD or EDD & restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022? Embassies/Consulates Extractive industries Gambling customers General Trading Companies Marijuana-related Entities MVTS/ MSB customers	Yes Restricted Restricted Restricted Always subject to EDD Prohibited Prohibited
30 b1 30 c 30 d 30 e 30 f 30 g 30 h 30 i	If EDD or EDD & restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022? Embassies/Consulates Extractive industries Gambling customers General Trading Companies Marijuana-related Entities MVTS/ MSB customers Non-account customers	Yes Restricted Restricted Restricted Always subject to EDD Prohibited Prohibited Prohibited
30 b1 30 c 30 d 30 e 30 f 30 g 30 h 30 i 30 j	If EDD or EDD & restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022? Embassies/Consulates Extractive industries Gambling customers General Trading Companies Marijuana-related Entities MVTS/ MSB customers Non-account customers Non-Government Organisations	Yes Restricted Restricted Restricted Always subject to EDD Prohibited Prohibited Prohibited EDD on a risk based approach
30 b1 30 c 30 d 30 e 30 f 30 g 30 h 30 i 30 j 30 k	If EDD or EDD & restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022? Embassies/Consulates Extractive industries Gambling customers General Trading Companies Marijuana-related Entities MVTS/ MSB customers Non-account customers Non-Government Organisations Non-resident customers	Yes Restricted Restricted Restricted Always subject to EDD Prohibited Prohibited Prohibited EDD on a risk based approach EDD on a risk based approach
30 b1 30 c 30 d 30 e 30 f 30 g 30 h 30 i 30 i 30 i 30 k 30 l	If EDD or EDD & restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022? Embassies/Consulates Extractive industries Gambling customers General Trading Companies Marijuana-related Entities MVTS/ MSB customers Non-account customers Non-account customers Non-Government Organisations Non-resident customers Nuclear power	Yes Restricted Restricted Restricted Always subject to EDD Prohibited Prohibited Prohibited EDD on a risk based approach EDD on a risk based approach Always subject to EDD
30 b1 30 c 30 d 30 e 30 f 30 g 30 h 30 i 30 j 30 k 30 l 30 m	If EDD or EDD & restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022? Embassies/Consulates Extractive industries Gambling customers General Trading Companies Marijuana-related Entities MVTS/ MSB customers Non-account customers Non-account customers Non-Government Organisations Non-resident customers Nuclear power Payment Service Provider	Yes Restricted Restricted Restricted Always subject to EDD Prohibited Prohibited Prohibited EDD on a risk based approach EDD on a risk based approach Always subject to EDD Always subject to EDD
30 b1 30 c 30 d 30 e 30 f 30 g 30 h 30 i 30 i 30 k 30 l 30 n	If EDD or EDD & restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022? Embassies/Consulates Extractive industries Gambling customers General Trading Companies Marijuana-related Entities MVTS/ MSB customers Non-account customers Non-account customers Non-Government Organisations Non-resident customers Nuclear power Payment Service Provider PEPs	Yes Restricted Restricted Restricted Always subject to EDD Prohibited Prohibited EDD on a risk based approach EDD on a risk based approach Always subject to EDD Always subject to EDD Always subject to EDD
30 b1 30 c 30 d 30 e 30 f 30 g 30 h 30 i 30 k 30 j 30 k 30 l 30 n 30 n	If EDD or EDD & restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022? Embassies/Consulates Extractive industries Gambling customers General Trading Companies Marijuana-related Entities MVTS/ MSB customers Non-account customers Non-account customers Non-Government Organisations Non-resident customers Nuclear power Payment Service Provider PEPs PEP Close AssociateS	Yes Restricted Restricted Restricted Always subject to EDD Prohibited Prohibited EDD on a risk based approach EDD on a risk based approach Always subject to EDD Always subject to EDD Always subject to EDD
30 b1 30 c 30 d 30 e 30 f 30 g 30 h 30 i 30 i 30 k 30 l 30 n 30 n 30 o 30 p	If EDD or EDD & restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022? Embassies/Consulates Extractive industries Gambling customers General Trading Companies Marijuana-related Entities MVTS/ MSB customers Non-account customers Non-account customers Non-Government Organisations Non-resident customers Nuclear power Payment Service Provider PEPs PEP Close Associates PEP Related	Yes Restricted Restricted Restricted Always subject to EDD Prohibited Prohibited Prohibited EDD on a risk based approach EDD on a risk based approach Always subject to EDD Always subject to EDD Always subject to EDD Always subject to EDD Always subject to EDD
30 b1 30 c 30 d 30 e 30 f 30 g 30 h 30 j 30 k 30 j 30 k 30 l 30 n 30 n 30 n 30 o 30 p 30 q	If EDD or EDD & restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022? Embassies/Consulates Extractive industries Gambling customers General Trading Companies Marijuana-related Entities MVTS/ MSB customers Non-account customers Non-account customers Non-Government Organisations Non-resident customers Nuclear power Payment Service Provider PEPs PEP Close Associates PEP Related Precious metals and stones	Yes Restricted Restricted Restricted Always subject to EDD Prohibited Prohibited Prohibited EDD on a risk based approach EDD on a risk based approach Always subject to EDD Always subject to EDD
30 b1 30 c 30 d 30 e 30 f 30 g 30 h 30 j 30 k 30 j 30 k 30 l 30 n 30 n 30 o 30 p 30 q 30 r	If EDD or EDD & restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022? Embassies/Consulates Extractive industries Gambling customers General Trading Companies Marijuana-related Entities MVTS/ MSB customers Non-account customers Non-account customers Non-Government Organisations Non-resident customers Nuclear power Payment Service Provider PEPs PEP Close Associates PEP Related Precious metals and stones Red light businesses/Adult entertainment	Yes Restricted Restricted Restricted Restricted Always subject to EDD Prohibited Prohibited EDD on a risk based approach EDD on a risk based approach Always subject to EDD
30 b1 30 c 30 d 30 e 30 f 30 g 30 h 30 j 30 k 30 j 30 k 30 l 30 n 30 n 30 o 30 p 30 q 30 c	If EDD or EDD & restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022? Embassies/Consulates Extractive industries Gambling customers General Trading Companies Marijuana-related Entities MVTS/ MSB customers Non-account customers Non-account customers Non-Government Organisations Non-resident customers Nuclear power Payment Service Provider PEPs PEP Close Associates PEP Related Precious metals and stones Red light businesses/Adult entertainment Regulated charities Shell banks	Yes Restricted Restricted Restricted Restricted Always subject to EDD Prohibited Prohibited EDD on a risk based approach EDD on a risk based approach Always subject to EDD Alwa
30 b1 30 c 30 d 30 e 30 f 30 f 30 j 30 k 30 j 30 k 30 l 30 n 30 n 30 o 30 p 30 q 30 r 30 s	If EDD or EDD & restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022? Embassies/Consulates Extractive industries Gambling customers General Trading Companies Marijuana-related Entities MVTS/ MSB customers Non-account customers Non-account customers Non-Government Organisations Non-resident customers Nuclear power Payment Service Provider PEPs PEP Close Associates PEP Related Precious metals and stones Red light businesses/Adult entertainment Regulated charities Shell banks Travel and Tour Companies	Yes Restricted Restricted Restricted Restricted Restricted Always subject to EDD Prohibited Prohibited EDD on a risk based approach EDD on a risk based approach Always subject to EDD Prohibited EDD on a risk based approach Prohibited EDD on a risk based approach Prohibited EDD on a risk based approach
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30 b1 30 c 30 d 30 e 30 f 30 g 30 h 30 j 30 k 30 j 30 k 30 j 30 k 30 l 30 n 30 o 30 p 30 q 30 q 30 c 30 s 30 t 30 v 30 v 30 v 30 v	If EDD or EDD & restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022? Embassies/Consulates Extractive industries Gambling customers General Trading Companies Marijuana-related Entities MVTS/ MSB customers Non-account customers Non-account customers Non-Government Organisations Non-resident customers Nuclear power Payment Service Provider PEPs PEP Close Associates PEP Related Precious metals and stones Red light businesses/Adult entertainment Regulated charities Shell banks Travel and Tour Companies Unregulated charities Used Car Dealers	Yes Restricted Restricted Restricted Restricted Always subject to EDD Prohibited Prohibited EDD on a risk based approach EDD on a risk based approach Always subject to EDD Prohibited EDD on a risk based approach
30 b1 30 c 30 d 30 e 30 f 30 g 30 h 30 j 30 k 30 j 30 k 30 l 30 n 30 n 30 o 30 p 30 q 30 c 30 c 30 d 30 d 30 c 30 d 30 d	If EDD or EDD & restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022? Embassies/Consulates Extractive industries Gambling customers General Trading Companies Marijuana-related Entities MVTS/ MSB customers Non-account customers Non-account customers Non-Government Organisations Non-resident customers Nuclear power Payment Service Provider PEPs PEP Close Associates PEP Related Precious metals and stones Red light businesses/Adult entertainment Regulated charities Shell banks Travel and Tour Companies Unregulated charities	Yes Restricted Restricted Restricted Restricted Always subject to EDD Prohibited Prohibited EDD on a risk based approach EDD on a risk based approach Always subject to EDD Prohibited EDD on a risk based approach Prohibited
30 b1 30 c 30 d 30 e 30 f 30 g 30 h 30 j 30 k 30 j 30 k 30 j 30 k 30 l 30 n 30 o 30 p 30 q 30 q 30 c 30 s 30 t 30 v 30 v 30 v 30 v	If EDD or EDD & restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022? Embassies/Consulates Extractive industries Gambling customers General Trading Companies Marijuana-related Entities MVTS/ MSB customers Non-account customers Non-account customers Non-Government Organisations Non-resident customers Nuclear power Payment Service Provider PEPs PEP Close Associates PEP Related Precious metals and stones Red light businesses/Adult entertainment Regulated charities Shell banks Travel and Tour Companies Unregulated charities Used Car Dealers	Yes Restricted Restricted Restricted Always subject to EDD Prohibited Prohibited Prohibited EDD on a risk based approach EDD on a risk based approach Always subject to EDD Always subject to EDD Prohibited EDD on a risk based approach Prohibited EDD on a risk based approach Prohibited Prohibited Prohibited Prohibited Prohibited Prohibited Prohibited Prohibited Sects, Astrology, Animal Selling business apart from
30 b1 30 c 30 d 30 e 30 f 30 g 30 h 30 j 30 k 30 j 30 k 30 j 30 k 30 j 30 k 30 g 30 g 30 k 30 g 30 k 30 g 30 k 30 g 30 g 30 k 30 g 30 k 30 g 30 g	If EDD or EDD & restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022? Embassies/Consulates Extractive industries Gambling customers General Trading Companies Marijuana-related Entities MVTS/ MSB customers Non-account customers Non-account customers Non-Government Organisations Non-resident customers Nuclear power Payment Service Provider PEPs PEP Close Associates PEP Related Precious metals and stones Red light businesses/Adult entertainment Regulated charities Shell banks Travel and Tour Companies Unregulated charities Used Car Dealers Virtual Asset Service Providers	Yes Restricted Restricted Restricted Restricted Always subject to EDD Prohibited Prohibited Prohibited EDD on a risk based approach EDD on a risk based approach Always subject to EDD Prohibited EDD on a risk based approach Prohibited EDD on a risk based approach Prohibited EDD on a risk based approach Prohibited Prohi
30 b1 30 c 30 d 30 e 30 f 30 g 30 h 30 j 30 k 30 j 30 k 30 j 30 k 30 l 30 n 30 o 30 p 30 q 30 q 30 c 30 s 30 t 30 v 30 v 30 v 30 v	If EDD or EDD & restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022? Embassies/Consulates Extractive industries Gambling customers General Trading Companies Marijuana-related Entities MVTS/ MSB customers Non-account customers Non-account customers Non-Government Organisations Non-resident customers Nuclear power Payment Service Provider PEPs PEP Close Associates PEP Related Precious metals and stones Red light businesses/Adult entertainment Regulated charities Shell banks Travel and Tour Companies Unregulated charities Used Car Dealers	Yes Restricted Restricted Restricted Always subject to EDD Prohibited Prohibited Prohibited EDD on a risk based approach EDD on a risk based approach Always subject to EDD Always subject to EDD Prohibited EDD on a risk based approach Prohibited EDD on a risk based approach Prohibited Prohibited Prohibited Prohibited Prohibited Prohibited Prohibited Prohibited Sects, Astrology, Animal Selling business apart from
30 b1 30 c 30 d 30 e 30 f 30 g 30 h 30 j 30 k 30 j 30 k 30 j 30 k 30 j 30 k 30 g 30 g 30 k 30 g 30 k 30 g 30 k 30 g 30 g 30 k 30 g 30 k 30 g 30 g	If EDD or EDD & restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022? Embassies/Consulates Extractive industries Gambling customers General Trading Companies Marijuana-related Entities MVTS/ MSB customers Non-account customers Non-account customers Non-Government Organisations Non-resident customers Nuclear power Payment Service Provider PEPs PEP Close Associates PEP Related Precious metals and stones Red light businesses/Adult entertainment Regulated charities Shell banks Travel and Tour Companies Unregulated charities Used Car Dealers Virtual Asset Service Providers	Yes  Restricted  Restricted  Restricted  Restricted  Always subject to EDD  Prohibited  Prohibited  Prohibited  EDD on a risk based approach  EDD on a risk based approach  Always subject to EDD  Prohibited  EDD on a risk based approach  Prohibited  EDD on a risk based approach  Prohibited  EDD on a risk based approach  Prohibited  Prohibited

11         If restricted, provide details of the restriction         by case basis or according to exclusion by default. Other categor with restricted approach. Arine, Martine, Read transport, defense and security sectors.           21         Does the Entity have risk basis policies, procedures and monitoring processes for the identification and reporting of suspicious activity?         Yes           22         Does the Entity have risk basis of complemented by manual controls, a inf manual or combination selected, specify what type and when, required by pocedures.         Combination of automated and manual transactions for suspicious activities?           33         af manual or combination selected, specify what type and when, required by pocedures.         Yes           44         Does the Entity have policies, procedures and processes to comply with suspicious transactions reporting requirements?         Yes           50         Does the Entity have policies, procedures and processes to comply with suspicious transactions reporting requirements?         Yes           7         PAYMENT TRANSPARECY         Yes           7         PAYMENT TRANSPARECY         Yes           7         PAYMENT TRANSPARECY         Yes           7         Local Regulations         Yes           7         Local Regulations         Yes           7         Local Regulations         Yes           7         Local Regulations         Yes           7 <th></th> <th>1</th> <th></th>		1	
11       If restricted, provide details of the restriction       with restricted approach. Aritine. Read transport, hydrocoros, coal, minel, civil nuclear energy, agriculture, defense and security sectors.         21       Does the Entity have risk based policies, procedures and monitoring processes for the identification and reporting for suspicious activities?       Yes         23       What is the method used by the Entity to monitor transactions are monitored manual and value, resulting by procedures and of transactions are monitored manual and value, resulting by procedures.       Combination of automated and manual framework and the processes to comply with suspicious transactions?         24       Does the Entity have regulatory requirements to reporting requirements?       Yes         25       Does the Entity have policies, procedures and processes to comply with suspicious transactions?       Yes         26       Does the Entity have policies, procedures and processes to review and scalate matters arising from the monitoring of customer transactions and activity?       Yes         27       PATMENT TRANSPARENCY       Does the Entity have policies, procedures and processes to comply with and have controls in place to report and processes to comply with and have controls in place to report and processes to comply with and have controls in place to report and processes to comply with and have controls in place to report and processes to the Entity have policies, procedures or the controls reasonably designed to report and processes to the processes or the controls reasonably designed to report and processes to the processes to report and the controls in place to report and processes to report and pr			We may refuse to enter into relationship with any client on a case
Environmental and the security sectors.     Advances and security sectors.     Advances and monitoring processes for the identification and reporting of suspicious activity?     Sectors and monitoring processes for the identification and reporting of suspicious activity?     Sectors and monitoring processes for the identification and reporting of suspicious activity?     Sectors activity and risk based policies, procedures and and when, required by procedures.     Sectors are policies, procedures and and when, required by procedures.     Sectors are policies, procedures and security activity?     Sectors are policies, procedures and security and when, required by processes to comply with suspicious transactions are policies, procedures and security and security and security and activity?     Sectors are policies, procedures and activity?     Sectors are processes to comply with and have controls in place to answer omplance with:     answer omplance with:     Sectors are policies, procedures and activity?			by case basis or according to exclusion by default. Other categorie
defense and security sectors.           AMONTCRING & REPORTING           Does the Entity have risk based polices, procedures and monitoring processes for the identification and reporting of suspicious activities?         Yes           Transaction for suspicious activities?         Combination of automated and menual transactions are monitored manually and when, required by procedures.           Wes         If Transactions are monitored manually and transactions are monitored manually and transactions are monitored manually processes to comply with suspicious transactions?         Yes           If Y, does the Entity have policies, procedures and apporting requirements?         Yes           Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity?         Yes           7. PAYMENT TRANSPARENCY         Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity?         Yes           7. PAYMENT TRANSPARENCY         Yes         Yes           Does the Entity have policies, procedures and processes to comply with and have controls in place to ensure compliance with: 37 Liff Y, specify the regulation         Yes           37 Liff Y, Septify the regulation         Yes         Yes           38 SANCTIONS         Yes         Yes           39 Dicos the Entity have a Sanctions Policy approved by management regarding compliance with sanctions lake vers stores and by designed to	31	If restricted, provide details of the restriction	with restricted approach: Airline, Maritime, Road transport,
defense and security sectors.           AMONTCRING & REPORTING           Does the Entity have risk based polices, procedures and monitoring processes for the identification and reporting of suspicious activities?         Yes           Transaction for suspicious activities?         Combination of automated and menual transactions are monitored manually and when, required by procedures.           Wes         If Transactions are monitored manually and transactions are monitored manually and transactions are monitored manually processes to comply with suspicious transactions?         Yes           If Y, does the Entity have policies, procedures and apporting requirements?         Yes           Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity?         Yes           7. PAYMENT TRANSPARENCY         Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity?         Yes           7. PAYMENT TRANSPARENCY         Yes         Yes           Does the Entity have policies, procedures and processes to comply with and have controls in place to ensure compliance with: 37 Liff Y, specify the regulation         Yes           37 Liff Y, Septify the regulation         Yes         Yes           38 SANCTIONS         Yes         Yes           39 Dicos the Entity have a Sanctions Policy approved by management regarding compliance with sanctions lake vers stores and by designed to			Hydrocarbons, coal, mining, civil nuclear energy, agriculture.
6. MONITORING & REPORTING  Does the Entity have risk based biplicies, procedures and monitoring processes for the identification and reporting of suspicious activity?  What is the method used by the Entity to monitor transactions for suspicious activities?  and monitoring processes to complementate by manual controls, a diff smarula for combination selected, specify what type Automated controls may be complemented by manual controls, a diff smarula for combination selected, specify what type Automated controls may be complemented by manual controls, a diff smarula for combination selected, specify what type Automated controls may be complemented by manual controls, a diff smarula for combination selected, specify what type Automated controls may be complemented by manual controls, a diff smarula for combination selected, specify what type Automated controls may be complemented by manual controls, a diff smarula for combination selected, specify what type Automated controls may be complemented by manual controls, a diff smarula for combination selected, specify what type Automated controls may be complemented by manual controls, a diff specify have policies, procedures and processes to comply with suspicious transactions reporting requirements? Does the Entity have policies, procedures and processes to comply with and have controls in place to ensure compliance with: Does the Entity have policies, procedures or other Control respective the regarding compliance with sanctions law papelicable to the Entity, including with respect to its business conduced with or through accounts held at foreign financial institutions? Does the Entity have policiels, procedures or other Control respective, accounters or other Control respective, accounters or other Control respective transactions allow and respective to respective and beneficial owners and for filter f			
22     and monitoring processes for the identification and reporting of suppicious activities?     Yes       33     and monitoring processes for the identification and reporting of suppicious activities?     Combination of automated and manual       34     and transactions for suspicious activities?     Combination of automated and manual       34     and transactions are monitored manually and when. required map is identify a processes to comply with suspicious transactions reporting requirements to report suspicious transactions?     Yes       36     If Y, does the Entity have policies, procedures and processes to comply with suspicious transactions reporting requirements to reporting requirements to reporting requirements processes to comply with auspicious transactions reporting requirements processes to comply with auspicious transactions reporting requirements processes to comply with and have controls in place to ensure compliance with:     Yes       37     Does the Entity have policies, procedures and processes to comply with and have controls in place to ensure compliance with:     Yes       38     Does the Entity have policies, procedures or the ensure compliance with:     Yes       38     Does the Entity have policies, procedures or other controls reasonably designed to prohibit and/or detect actions taken to evade applicable sonctions have applicable to the Entity, including with respect to its business conducted with or through accounts held at foreign financial institutions?     Yes       39     Does the Entity have policies, procedures or other controls reasonably designed to prohibit and/or detect atons taken to evade applicable sonctions and/or masking, o	6. M	ONITORING & REPORTING	
12     and monitoring processes for the identification and reporting of supicious activities?     Yes       13     what is the method used by the Entity to monitor transactions for supicious activities?     Combination of automated and manual       14     and transactions for supicious activities?     Combination of automated and manual       14     and transactions are monitored manually and whan, required by procedures.     Automated controls may be complemented by manual controls, a and whan, required by procedures.       16     Automated controls in a processes to comply with supplicubic transactions reporting requirements?     Yes       17     Automated controls, procedures and processes to comply with supplicubic group apment Transparency Standards?     Yes       20     Does the Entity have policies, procedures and processes to comply with and have controls in place to ensure compliance with:     Yes       21     Local Regulations     Yes       22     If Y. Specify the regulation     EU 2015/847 Regulation notably       27     If Y. Specify the regulation     Yes       28     SAMCTIONE     Yes       29     Does the Entity have policies, procedures or other controls reasonably designed to prohibit and/or detect actions taken to evade applicable to rebuilts and/or detect actions taken to evade applicable sonctions prohibitons, such as stripping, or the resubmission and/or macking, of sanctions relevant information in cross bord transactions and regularly thereafter against Sanctions Lists (UM)       28     Sanctions Lis		Does the Entity have risk based policies, procedures	
reporting of suspices activity?         Combination           33         What is the method used by the Entity to monitor transactions for suspicious activities?         Combination of annual           34         If manual or combination selected, specify what type dof transactions are monitored manually report suspicious transactions?         Automated controls may be complemented by manual controls, a dof transactions are monitored manually reports spicious transactions?           35         If Y, does the Entity have repulses, procedures and processes to comply with suspicious transactions report suspicious transactions and activity?         Yes           36         Does the Entity have policies, procedures and processes to comply with and have controls in place to ensure compliance with:         Yes           37         Does the Entity have policies, procedures and processes to comply with and have controls in place to ensure compliance with:         Yes           37         Does the Entity have policies, procedures and processes to comply with and have controls in place to ensure compliance with:         Yes           37         Local Regulations         Yes         Yes           37         Local Regulations         Yes           38         applicable to the Entity have a Sanctions Policy approved by management regarding compliance with sanctions tav applicable to the Entity including with respect to its business conducted with, or through accounts hid at foreign financial institutions?         Yes           39         Does the Entity have a S	32		Yes
33         What is the method used by the Entity to monitor transactions for suspictous activities?         Combination of automated and manual           33 a         If manual or combination selected, specify what type of transactions are monitored manually and when, required by procedures.         Automated controls may be complemented by manual controls, a and when, required by procedures.           34 a         Does the Entity have policles, procedures and processes to comply with suspicious transactions reporting requirements?         Yes           35 processes to review and escalate matters arising from the monitoring of customer transactions and activity?         Yes           36 Does the Entity have policles, procedures and processes to comply with and have controls in place to ensure compliance with:         Yes           37 Does the Entity have to the Wolfsberg Group payment Transparency Standards?         Yes           37 Does the Entity have policies, procedures and processes to complaince with:         Yes           37 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 foright finacial institutions?         Yes           38 SANCTIONS         Yes           39 Does the Entity have a Sanctions Policy approved by management regarding compliance with sanctions law prohibitions, such as stripping, or the resubmission and/or mashing, of sanctions relevant inford/or detect actions taken to evade applicable sanctions prohibitions, such as stripping, or the resubmission and/or mashing, of san	,,		
Transactions for supplicus activities?         Combination automated and manual           If manual or combination selected, specify what type a furnasactions are monitored manualy and when, required by procedures.         Automated controls may be complemented by manual controls, a and when, required by procedures.           If Y, does the Entity have regulatory requirements to report supplicus transactions?         Yes           Does the Entity have policies, procedures and processes to comply with supplicus transactions processes to comply with supplicus transactions and activity?         Yes           Does the Entity have policies, procedures and processes to comply with and have controls in place to ensure compliance with:         Yes           Does the Entity have policies, procedures and processes to comply with and have controls in place to ensure compliance with:         Yes           To ATT Recommendation 16         Yes         Yes           To Local Regulations         Yes         Yes           So Sont Entity have policies, procedures or other oncosises co comply with and have controls in place to ensure compliance with:         Yes           To Local Regulations         Yes         Yes           So Sont Chronic Sont Policy approved by management regarding compliance with sanctions law prohibitions, such as stripping, or the resubmission and/or masing, of sanctions Policy approved by management regarding compliance with sanctions law prohibitions, such as stripping, or the resubmission and/or masing, of sanctions relevant information in cross border transactions?         Yes			
If manual or combination selected, specify what type Automated controls may be complemented by manual controls, a and when, required by procedures.         If ansactions are monitored manually       and when, required by procedures.         If ansactions are monitored manually.       Yes         If A transactions?       Yes         If Y, does the Entity have policies, procedures and processes to comply with supplicious transactions and activity?       Yes         Does the Entity ave policies, procedures and processes to review and escalate matters arising from Yes       Yes         Does the Entity ave policies, procedures and processes to comply with supplicies, procedures and processes to comply with and have controls in place to ensure compliance with:       Yes         Zie AFIR Recommendation 16       Yes       Yes         Total FAIR Recommendation 16       Yes         Zie If M, explain       EU 2015/847 Regulation notably         Boes 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 finalial institutions?       Yes         Does the Entity have a stanctions relevant information in cross border transactions are lowed information in cross border transactions?       Yes         Does the Entity have policies, procedures or other controls reasonably designed to probibit and/or detect actions taking, of sanctions relevant information in cross broder transactions lates:       Yes <t< td=""><td>22</td><td>What is the method used by the Entity to monitor</td><td>Combination of automated and manual</td></t<>	22	What is the method used by the Entity to monitor	Combination of automated and manual
323     and when, required by procedures.       34     Does the Entity have requirements to report suspicious transactions?     Yes       35     if if y does the Entity have policies, procedures and processes to comply with suspicious transactions reporting requirements?     Yes       35     processes to comply with suspicious transactions reporting of customer transactions and activity?     Yes       36     processes to review and escalate matters arising from Yes     Yes       37     processes to review and escalate matters arising from Yes     Yes       36     Does the Entity have policies, procedures and processes to comply with and have controls in place to ensure compliance with:     Yes       37     Does the Entity have policies, procedures and processes to comply with and have controls in place to ensure compliance with:     Yes       37     Does the Entity have policies, procedures and processes to comply with and have controls in place to ensure compliance with:     Yes       37     If Y., Specify the regulation     EU 2015/847 Regulation notably       38     applicable to the Entity, including with respect to its business conducted with, place procedures or other controls reasonably designed to prohibit and/or detect actions taken to evade applicable sanctions relevant information in cross border transactions?     Yes       39     Solect the Sanctions Star Surger Surger Sanctions Security Council transactional data     Yes       314     Solect the Sanctions Star Surger Sanctions Security Council transactional dat	55	transactions for suspicious activities?	
323     and when, required by procedures.       34     Does the Entity have requirements to report suspicious transactions?     Yes       35     if if y does the Entity have policies, procedures and processes to comply with suspicious transactions reporting requirements?     Yes       35     processes to comply with suspicious transactions reporting of customer transactions and activity?     Yes       36     processes to review and escalate matters arising from Yes     Yes       37     processes to review and escalate matters arising from Yes     Yes       36     Does the Entity have policies, procedures and processes to comply with and have controls in place to ensure compliance with:     Yes       37     Does the Entity have policies, procedures and processes to comply with and have controls in place to ensure compliance with:     Yes       37     Does the Entity have policies, procedures and processes to comply with and have controls in place to ensure compliance with:     Yes       37     If Y., Specify the regulation     EU 2015/847 Regulation notably       38     applicable to the Entity, including with respect to its business conducted with, place procedures or other controls reasonably designed to prohibit and/or detect actions taken to evade applicable sanctions relevant information in cross border transactions?     Yes       39     Solect the Sanctions Star Surger Surger Sanctions Security Council transactional data     Yes       314     Solect the Sanctions Star Surger Sanctions Security Council transactional dat		If manual or combination selected, specify what type	Automated controls may be complemented by manual controls, as
Joes the Entity have regulatory requirements to report suspicious transactions?         Yes           117, does the Entity have policies, procedures and processes to comply with suspicious transactions reporting requirements?         Yes           2000 bots the Entity have policies, procedures and processes to creview and escalate matters arising from the monitoring of customer transactions and activity?         Yes           31         Does the Entity have policies, procedures and processes to comply with suspicious transactions and activity?         Yes           36         Does the Entity adverte to the Wolfsberg Group Payment Transparency Standards?         Yes           37         Does the Entity have policies, procedures and processes to comply with and have controls in place to ensure compliance with:         Yes           37         FATF Recommendation 16         Yes           37.0         If Y, Specify the regulation         EU 2015/847 Regulation notably           37.1         If Y, Specify the regulation         EV 2015/847 Regulation notably           38         applicable to 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           39         Does the Entity have allocials procedures or other controls reaconably designed to prohibit and/or detect actions taken to evade applicable sanctions prohibitions, such as stripping, or the resubmission and/or masking, of sa	33 a		
44       report suppicious transactions?       Yes         16       If Y, does the Entity have policies, procedures and processes to comply with suppicious transactions reporting requirements?       Yes         20       Dest the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity?       Yes         7. PAYMENT TRANSPARENCY       Does the Entity have policies, procedures and processes to comply with and have controls in place to ensure compliance with:       Yes         27. a       FAIF Recommendation 16       Yes         27. a       If Y, specify the regulations       Yes         27. a       If Y, specify the regulation       EU 2015/847 Regulation notably         27. a       If Y, specify the regulation seconduct with, or through accounts held at foreign financial institutions?       Yes         28. sounduct with, or through accounts held at foreign financial institutions?       Yes         29. boes the Entity have policies, procedures or other controls reasonably designed to prohibit and/or detect actions taken to evade applicable sanctions and/or masking, of sanctions relevant information in cross border transactions?       Yes         20. boes the Entity nore policies, procedures or other		· · ·	
af 7, does the Entity have policies, procedures and processes to comply with suspicious transactions Yes       Yes         boos the Entity have policies, procedures and processes to review and escalate matters arising from Yes       Yes         coses the Entity adhere to the Wolfsberg Group Payment Transparency Standards?       Yes         Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards?       Yes         Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards?       Yes         Does the Compliance with:       Yes         17 Liff Y, Specify the regulation       Yes         27 Liff Y, Specify the regulation       Yes         27 Liff Y, Specify the regulation       Yes         28 SANCTIONS       Yes         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?         Does the Entity have a Sanctions relevant information in cross border transaction?       Yes         290       Does the Entity have a Sufcalse recevers or other controls reasonably designed to prohibit and/or detect actions taken to evade applicable sanctions relevant information in cross border transaction?       Yes         200       Does the Entity storeen its customers, including beneficial owners and beneficial owners and for filter transactional data       Yes         211       S	34		Yes
34 a     processes to comply with supplicous transactions     Yes       Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity?     Yes       7. PAYMENT TRANSPARENCY     Does the Entity have policies, procedures and processes to comply with and have controls in place to ensure compliance with:     Yes       37 Does the Entity have policies, procedures and processes to comply with and have controls in place to ensure compliance with:     Yes       37 Local Regulations     Yes       37 Local Regulations     Yes       37 Local Regulations     Yes       38 SANCTONS     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       00es the Entity have policies, procedures or other controls reasonably designed to prohibit and/or detect actions sken, of sanctions relevant information in cross border transactions grocesses:     Yes       41 Dubit United States Department of the Treasury's Office of torrely france law to be the Treasury's Office of transactional data     Used for screening customers and beneficial owners and for filter transactional data       42 Dubit det Financial States Department of the Treasury's Office of transactional data     Used for screening customers and beneficial owners and for filter transactional			
reporting requirements?         Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity?         7. PAYMENT TRANSPARENCY         36       Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards?       Yes         37. a       FATF Recommendation 16       Yes         37. bit if Y, Specify the regulation       EU 2015/847 Regulation notably       27         27. c       If M, explain       Example       Yes         38. SANCTIONS       Does the Entity have a Sanctions Policy approved by management regarding compliance with sanctions law applicable to the Entity, inducting with respect to its business conducted with, or through accounts held at foreign financial institutions?       Yes         Does the Entity have policies, procedures or other controls reasonably designed to prohibit and/or detect actions such as trying and regularly thereafter against Sanctions Lists applicable sanctions is creaning under guilary thereafter against Sanctions Lists we by the Entity in time data       Yes         30       Does the Entity roung obording and regulary thereafter against Sanctions List we by the Entity in time data       Yes         31       Consolidated United Nations Security Council       Us			
Books the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity?     Yes       36     Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards?     Yes       37     Does the Entity have policies, procedures and processes to comply with and have controls in place to ensure compliance with:     Yes       37     I Cal Regulations     Yes       37     I Cal Regulation     EU 2015/847 Regulation notably       37     I Cal Regulation     Yes       38     applicable to the Entity, including with respect to its business conducted with, or through accounts held at foreign financial institutions?     Yes       39     Does the Entity have policies, procedures or other controls reasonaby 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       41     Consolidated United Nations Security Council sanctions List?     Used for acceening customers and beneficial owners and for filter transactional data       41     United States Department of the Treasury's Office of Foreign Assets Control (DFAC)     Used for acceening customers and beneficial owners and for filter	34 a	processes to comply with suspicious transactions	Yes
Books the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity?     Yes       36     Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards?     Yes       37     Does the Entity have policies, procedures and processes to comply with and have controls in place to ensure compliance with:     Yes       37     I Cal Regulations     Yes       37     I Cal Regulation     EU 2015/847 Regulation notably       37     I Cal Regulation     Yes       38     applicable to the Entity, including with respect to its business conducted with, or through accounts held at foreign financial institutions?     Yes       39     Does the Entity have policies, procedures or other controls reasonaby 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       41     Consolidated United Nations Security Council sanctions List?     Used for acceening customers and beneficial owners and for filter transactional data       41     United States Department of the Treasury's Office of Foreign Assets Control (DFAC)     Used for acceening customers and beneficial owners and for filter		reporting requirements?	
35       morecesses to review and escalate matters arising from the monitoring of customer transactions and activity?       Yes         7. PAYMENT TRANSPARENCY       Yes         36       Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards?       Yes         37       Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards?       Yes         37       Does the Entity have policies, procedures and processes to complance with:       Yes         37       FATF Recommendation 16       Yes         37.1       If Y, Specify the regulation       EU 2015/847 Regulation notably         37.2       If N, explain       Zes         8. SANCTIONS       Does the Entity have a Sanctions Policy approved by management regarding compliance with sanctions law applicable to the Entity, or through accounts held at foreign financial institutions?       Yes         Does the Entity have policies, procedures or other controls reasonably designed to prohibit and/or detect actions such as tripping, or the resubmission and/or masking, of sanctions relevant information in cross border transactions?       Yes         38       Select the Sanctions Lists       Yes         39       Exections scients used by the Entity in its sanctions sciently council and regarding and regularly thereafter against Sanctions Lists       Yes         41       Select the Sanctions is usude by the truty in its sanctions scusta stripping, or the resubmission and/or masking, of sanctions i		· · ·	
the monitoring of customer transactions and activity?           7. PAYMENT TRANSPARENCY           36         Does the Entity Adhere to the Wolfsberg Group Payment Transparency Standards?         Yes           37         Does the Entity have policies, procedures and processes to comply with and have controls in place to ensure compliance with:         Yes           37 a         FATF Recommendation 16         Yes           37 b         Local Regulations         Yes           37 c         If N, specify the regulation         EU 2015/847 Regulation notably           38 a         SANCTONS         EV 2015/847 Regulation notably           38 applicable to the Entity, including with respect to its business conducted with, or through accounts held at foreign financial institutions?         Yes           39 boes the Entity have applicable, 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           40         Select the Sanctions Lists?         Ves           41         Select the Sanctions Lists used by the Entity in its sanctions screening processes: Consolidated United Nations Security Council sanctions list (UN)         Used for screening customers and beneficial owners and for filter transactional data           41         Config of Financial Sanctions implementation HMT (OrS)         Used for screenin	25		Ves
7. PAYMENT TRANSPARENCY       Yes         36       Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards?       Yes         37       Does the Entity have policies, procedures and processes to comply with and have controls in place to ensure compliance with:       Yes         37       D tocal Regulations       Yes         37       D tocal Regulations       Yes         37 bt       Discal Regulations       Yes         37 bt       Discal Regulations       Yes         37 bt       Discal Regulations       Yes         38 SANCTIONS       EU 2015/847 Regulation notably       Business conducted with, and through accounts held at foreign financial institutions?         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         Does the Entity have policies, procedures or other controls reasonably designed to prohibit and/or detect actions taken to evade applicable sanctions in prohibitions, such as stripping, or the resubmission and/or masking, of sanctions relevant information in cross border transactions?       Yes         Does the Entity have a Such to vate the transactional data       Yes         41       Select the Sanctions Lists used by the Entity in its sanctions stareening processes:       Yes         42       Select the Sanct			
36     Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards?     Yes       Does the Entity have policies, procedures and processes to comply with and have controls in place to ensure compliance with:     Yes       37     FATF Recommendation 16     Yes       39     Local Regulations     Yes       37     If Y, Specify the regulation     EU 2015/847 Regulation notably       37     If Y, Specify the regulation     EU 2015/847 Regulation notably       37     If Y, Specify the regulation 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       Does the Entity have policies, procedures or other controls reasonably designed to prohibit and/or detect actions taken to evade applicable sanctions mohor masking, of sanctions relevant information in cross border transactions?     Yes       00     Beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions scentry Soffice of Sanctions screening processes:     Yes       11     Consolidated United Nations Security Council     Used for screening customers and beneficial owners and for filter transactional data       12     Office of Financial Sanctions Implementation HMT (Orsi)     Used for screening customers and beneficial owners and for filter transactional data       13     Consolidated United Nations Security Soffice of Used for screening customers and beneficial owners and for filter transactio			
94     Payment Transparency Standards?     Yes       Does the Entity have policies, procedures and processes to comply with and have controls in place to ensure compliance with:     Yes       37 a     FATF Recommendation 16     Yes       37 b     Local Regulations     Yes       37 b     If Y, Specify the regulation     EU 2015/847 Regulation notably       37 c     If N, explain     B       8 SANCTIONS     Does the Entity have a Sanctions Policy approved by management regarding compliance with sanctions law applicable to the Entity, including with respect to 18     Yes       9 Does the Entity have a Sanctions Policy approved by management regarding compliance with sanctions law applicable to the Entity, including with respect to 18     Yes       9 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 tripping, or the resubmission and/or masking, of sanctions relevant information in cross border transactions?     Yes       90     Does the Entity average and regularly threafter against Sanctions Lists?     Yes       41     Select the Sanctions ists used by the Entity in its sanctions Screening processes:     Used for screening customers and beneficial owners and for filter transactional data       41     United States Department of the Treasury's Office of Foreign Assets Control (OFAC)     Used for screening customers and beneficial owners and for filter transactional data       41     European Union Consolidated List (EU)	7. PA	AYMENT TRANSPARENCY	
94     Payment Transparency Standards?     Yes       Does the Entity have policies, procedures and processes to comply with and have controls in place to ensure compliance with:     Yes       37 a     FATF Recommendation 16     Yes       37 b     Local Regulations     Yes       37 b     If Y, Specify the regulation     EU 2015/847 Regulation notably       37 c     If N, explain     B       8 SANCTIONS     Does the Entity have a Sanctions Policy approved by management regarding compliance with sanctions law applicable to the Entity, including with respect to 18     Yes       9 Does the Entity have a Sanctions Policy approved by management regarding compliance with sanctions law applicable to the Entity, including with respect to 18     Yes       9 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 tripping, or the resubmission and/or masking, of sanctions relevant information in cross border transactions?     Yes       90     Does the Entity average and regularly threafter against Sanctions Lists?     Yes       41     Select the Sanctions ists used by the Entity in its sanctions Screening processes:     Used for screening customers and beneficial owners and for filter transactional data       41     United States Department of the Treasury's Office of Foreign Assets Control (OFAC)     Used for screening customers and beneficial owners and for filter transactional data       41     European Union Consolidated List (EU)	20	Does the Entity adhere to the Wolfsberg Group	Vac
Does the Entity have policies, procedures and processes to comply with and have controls in place to ensure compliance with:         37       Experimentation 16       Yes         38       FATF Recommendation 16       Yes         37       If V, specify the regulation       EU 2015/847 Regulation notably         37       If V, specify the regulation       EU 2015/847 Regulation notably         37       If N, explain       Yes         38       applicable to the Entity, including with respect to its business conducted with, or through accounts held at foreign financial institutions?       Yes         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         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         40       Elect the Sanctions Lists wead by the Entity in its sanctions screening processes:       Yes         41       Select the Sanctions Lists wead by the Entity in its sanctions screening processes:       Used for screening customers and beneficial owners and for filter transactional data         41       Consolidated United Nations Security Council Sanctions List (UN)	36	Payment Transparency Standards?	Yes
37       processes to comply with and have controls in place to ensure compliance with:         37       a FATF Recommendation 16       Yes         37 b. If Recommendation 16       Yes         37 b. If Y, Specify the regulation       EU 2015/847 Regulation notably         37 c. If N, explain       E         8. SANCTIONS       Explain         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?         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         Does the Entity have a policable sanctions and/or masking, of sanctions relevant information in cross border transactions?       Yes         90       beneficial ownership information collected by the Entity ouring onboarding and regularly thereafter against Sanctions Lists?       Yes         41       Select the Sanctions Ists used by the Entity in its sanctions Screening processes:       Sanctions List?         41       Consolidated United Nations Security Council Sanctional data       Used for screening customers and beneficial owners and for filter transactional data         41       Consolidated United Nations Security Council Sanctions List?       Used for screening customers and			
ensure compliance with:       PATF Recommendation 16       Yes         37 a       FATF Recommendation 16       Yes         37 b       Local Regulations       Yes         37 b1       If Y, Specify the regulation       EU 2015/847 Regulation notably         37 c       If N, explain       EU 2015/847 Regulation notably         38 applicable to the Entity, including with respect to its business conducted with, or through accounts held at foreign financial institutions?       Yes         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         20       Does the Entity screen its customers, including beneficial ownershin information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists?       Yes         41       Consolidated United Nations Security Council       Used for screening customers and beneficial owners and for filter transactional data         41       Consolidated United Nations Security Council       Used for screening customers and beneficial owners and for filter transactional data         41       Consolidated United Nations Security Council       Used for screening customers and beneficial owners and for filter transactional data         41       Consolidated by other G7 member countricies       Used for screening cust	27		
37 a       FATF Recommendation 16       Yes         37 b       Local Regulations       Yes         37 b       If Y, specify the regulation       EU 2015/847 Regulation notably         37 c       If N, explain       EU 2015/847 Regulation notably         8. SANCTIONS       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         Does the Entity have policies, procedures or other controls reasonably designed to prohibit and/or detect actions taken to evade applicable sanctions in prohibitions, such as stripping, or the resubmission and/or masking, of sanctions relevant information in cross border transactions?       Yes         Does the Entity, varied in a stripping, or the resubmission and/or masking, of sanctions relevant information in cross border transactions?       Yes         00       Boefficial ownership information collected by the Entity in its sanctions screening processes:       Yes         41       Consolidated United Nations Security Council transactional data       Used for screening customers and beneficial owners and for filter transactional data         41       Uropean Union Consolidated List (EU)       Used for screening customers and beneficial owners and for filter transactional data         41       European Union Consolidated List (EU)       Used for screening customers and beneficial owners and for filter transactional data </td <td>57</td> <td></td> <td></td>	57		
37 b       Local Regulations       Yes         37 b1       If Y, Specify the regulation       EU 2015/847 Regulation notably         37 c       If N, explain       EU 2015/847 Regulation notably         37 c       If N, explain       EU 2015/847 Regulation notably         37 c       If N, explain       EU 2015/847 Regulation notably         37 b1       Local Regulations       EU 2015/847 Regulation notably         37 b2       If N, explain       EU 2015/847 Regulation notably         37 b1       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         Does the Entity have policies, procedures or other controls reasonably designed to prohibit and/or detect adjor masking, of sanctions relevant information in cross border transactions?       Yes         40       Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists well by the Entity in its sanctions screening processes:       Yes         41       Consolidated United Nations Security Council       Used for screening customers and beneficial owners and for filter transactional data         41 b       United States Department of the Treasury's Office of (OFS)       Used for screening customers and beneficial owners and for filter tran			
37 bi       If Y, Specify the regulation       EU 2015/847 Regulation notably         37 c       If N, explain       If N, explain         8. SANCTIONS       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         38       applicable to 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         30       Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists?       Yes         41       Select the Sanctions Lists used by the Entity in its sanctions screening processes:       Yes         41       Solidated United Nations Security Council Sanctions List (UN)       Used for screening customers and beneficial owners and for filter transactional data         41       Conficidated Nation Simplementation HMT (OFSI)       Used for screening customers and beneficial owners and for filter transactional data         41       European Union Consolidated List (EU)       Used for screening customers and beneficial owners and for filter transactional data         41       European Union Consolidated List (EU)       Used for screening custome	37 a	FATF Recommendation 16	Yes
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comprehensive jurisdiction-based Sanctions?	41 a 41 b 41 c 41 d 41 e 41 f	against Sanctions Lists? Select the Sanctions Lists used by the Entity in its sanctions screening processes: Consolidated United Nations Security Council Sanctions List (UN) United States Department of the Treasury's Office of Foreign Assets Control (OFAC) Office of Financial Sanctions Implementation HMT (OFSI) European Union Consolidated List (EU) Lists maintained by other G7 member countries Other (specify) Does the Entity have a physical presence, e.g. branches, subsidiaries, or representative offices located in countries/regions against which UN, OFAC,	transactional data Used for screening customers and beneficial owners and for filterin transactional data Used for screening customers and beneficial owners and for filterin transactional data Used for screening customers and beneficial owners and for filterin transactional data Used for screening customers and beneficial owners and for filterin transactional data BFCM applies the Crédit Mutuel Alliance Fédérale common set of lists, which includes the lists of all countries in wich it operates.
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43	Does the Entity provide mandatory training, which				
43					
43 a	Identification and reporting of transactions to	Yes			
	government authorities				
	Examples of different forms of money laundering,				
43 b	terrorist financing and sanctions violations relevant	Yes			
	for the types of products and services offered				
43 c	Internal policies for controlling money laundering,	Yes			
-50	terrorist financing and sanctions violations				
43 d	New issues that occur in the market, e.g. significant	Yes			
	regulatory actions or new regulations				
44	Is the above mandatory training provided to :				
44 a	Board and Senior Committee Management	Yes			
44 b	1st Line of Defence	Yes			
44 c	2nd Line of Defence	Yes			
44 d	3rd Line of Defence	Yes			
44 e	Third parties to which specific FCC activities have	Not Applicable			
44 E	been outsourced				
44 f	Non-employed workers (contractors/consultants)	No			
10. A	UDIT				
	In addition to inspections by the government				
	supervisors/regulators, does the Entity have an				
45	internal audit function, a testing function or other	Yes			
<b>1</b>	independent third party, or both, that assesses FCC				
	AML, CTF, ABC, Fraud and Sanctions policies and				
	practices on a regular basis?				
Signat	ure Page				
Signat	<u>ure rage</u>				
Wolfsł	perg Group Financial Crime Compliance Questionnaire (FCCQ	V1 2)			
Banqu	e Fédérative du Crédit Mutuel (BFCM)				
I, Pierre-Yves LE BORGNE (Group Head of Financial Crime Compliance, Crédit Mutuel Alliance Fédérale), certify that I have read and					
understood this declaration, that the answers provided in this Wolfsberg FCCQ are complete and correct to my honest belief.					
$\mathcal{D}_{\mathcal{A}}$ =					
22 Ian	22 January 2025 (Signature & Date)				
22 5011	(0,6),000				
1					