Money Laundering Prevention

CFM Indosuez Wealth, located 11 Boulevard Albert 1er, BP 499, MC 98012 Monaco Cedex, is a 70,12% owned subsidiary of Crédit Agricole Corporate and Investment Bank (CA-CIB), 9 quai du Président Paul Doumer, 92920 Paris La Défense Cedex. The other shareholders are various natural persons and legal entities, and none of them owns or controls 10% or more of **CFM Indosuez Wealth**.

In compliance with international laws and regulations and with Crédit Agricole S.A. Group policy, **CFM Indosuez Wealth** has implemented a control framework for the prevention of money laundering and terrorism financing and for the enforcement of embargo and freezing of assets. This framework is in place for **CFM Indosuez Wealth** and its subsidiaries.

CFM Indosuez Wealth, as a credit and financial institution, is controlled by the Autorité de Contrôle Prudentiel et de Résolution (ACPR, French regulator of banking institutions, 61 Rue Taitbout, FR 75009 Paris) and by the Commission de Contrôle des Activités Financières (CCAF, Monegasque regulator for financial institutions, 4 Rue des Iris, BP 540, MC 98015 MONACO Cedex).

The control framework in place within the Bank includes both international and domestic laws and regulations.

International obligations are:

- The 40 recommendations issued by the Financial Action Task Force (FATF) in February 2012 and updated in November 2017, which provide a set of counter-measures against money laundering and terrorism financing (http://fatf.gafi.org/fr/) ;
- The Monetary Agreement between the Principality of Monaco and the European Union, dated December 5, 2011, referring to the European Union Directives, dated 26 October 2005 and 1 August 2006, aiming to harmonize practices between Member States.

National obligations are set out in the Act N° 1.462 dated June 28, 2018 related to the fight against money laundering, terrorist financing and corruption, and Sovereign Order N° 7.065 dated July 26, 2018 of its application.
These obligations require:

- Client identification, at account opening and during the full lifecycle of the business relationship ;
- The collection of information on complex and unusual operations and on any operations without an economic justification ;
- The maintenance of an audit trail for all copies of documents collected for identification purposes or for transactions justifications ;
- The abstention for entering into a business relationship or the refusal to execute any operation for which it was not possible to obtain relevant or acceptable information ;
- The submission of Suspicious Activity Reports to the Service d'Information et de Contrôle sur les Circuits Financiers (SICCFIN, the Monegasque Financial Intelligence Unit created under the Act 1.362 - http://www.siccfin.gouv.mc/)

CFM Indosuez Wealth
Two directives, issues respectively by the Credit Agricole S.A. Group and by the Wealth Management business line define the organization and the obligations of a financial security framework dedicated to the control and management of the risks related to money laundering, terrorism financing, embargo and freezing of assets.

These directives are implemented by **CFM Indosuez Wealth** and are an integral part of the Compliance monitoring system, in particular:

- Appointment of a Head of Compliance, responsible for the implementation of Group's rules and both national and international obligations ;
- Definition, implementation and monitoring of policies and procedures ;
- Definition of rules regarding new business relationships acceptation (Know Your Customer Policy) ;
- Implementation of transaction and account monitoring systems ;
- Investigation on any unusual and suspicious transactions ;
- Planning and monitoring Compliance training ;
- Escalation to the Executive Management in case of non-compliant situations.

On behalf of CFM Indosuez Wealth, October 1, 2018
Jean-Philippe ORY, Head of Compliance

CFM Indosuez Wealth

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CFM Indosuez Wealth
Banque Monégasque autorisée
par Ordonnance Souveraine
du 13 juillet 1922

Société anonyme monégasque
au capital de EUR 34.953.000
RCI 56S00341