the Wolfsberg Group

		-1-1	1 4			
-11	ıan	ıcıaı	IIISI	itutio	n Na	me

CFM Indosuez Wealth

Location (Country) :

Principality of Monaco

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.

questio	nnaire can be completed for that branch.				
No#	Question	Answer			
1. ENT	1. ENTITY & OWNERSHIP				
1	Full Legal Name	CFM Indosuez Wealth			
2	Append a list of foreign branches which are covered by this questionnaire	CFM Indosuez Gestion CFM Indosuez Conseil en Investissement			
3	Full Legal (Registered) Address	11, boulevard Albert 1er MC 98000 Monaco - Principauté de Monaco			
4	Full Primary Business Address (if different from above)				
5	Date of Entity incorporation/ establishment	18/07/1922			
6	Select type of ownership and append an ownership chart if available				
6 a	Publicly Traded (25% of shares publicly traded)	Yes			
6 a1	If Y, indicate the exchange traded on and ticker symbol	Euronext Paris - MC0010000826			
6 b	Member Owned/ Mutual	No			
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)?	No			
8 a	If Y, provide the name of the relevant branch/es which operate under an OBL				
9	Name of primary financial regulator / supervisory authority	Autorité de Contrôle Prudentiel et de Résolution (ACPR) / France Commission de Contrôle des Activités Financières (CCAF) / Monaco			

10	Provide Legal Entity Identifier (LEI) if available	5493007USZNUUKBOLU32
11	Provide the full legal name of the ultimate parent (if different from the Entity completing the DDQ)	Crédit Agricole SA
12	Jurisdiction of licensing authority and regulator of ultimate parent	France
13	Select the business areas applicable to the Entity	
13 a	Retail Banking	Yes
13 b	Private Banking / Wealth Management	Yes
13 с	Commercial Banking	Yes
13 d	Transactional Banking	No
13 e	Investment Banking	No
13 f	Financial Markets Trading	No
13 g	Securities Services / Custody	Yes
13 h	Broker / Dealer	No
13 i	Multilateral Development Bank	No
13 j	Other	
14	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.)	Yes
14 a	If Y, provide the top five countries where the non- resident customers are located.	France 7% / Switzerland 4% / UK 4% / Luxembourg 4% / Italie 3%
15	Select the closest value:	
15 a	Number of employees	201-500
15 b	Total Assets	Greater than \$500 million
16	Confirm that all responses provided in the above Section ENTITY & OWNERSHIP are representative of all the LE's branches	Yes
16 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
16 b	If appropriate, provide any additional information / context to the answers in this section.	

	PRODUCTS & SERVICES			
17	Does the Entity offer the following products and services:			
17 a	Correspondent Banking	No		
17 a1	If Y			
17 a2	Does the Entity offer Correspondent Banking services to domestic banks?			
17 a3	Does the Entity allow domestic bank clients to provide downstream relationships?			
17 a4	Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks?	A-		
17 a5	Does the Entity offer correspondent banking services to Foreign Banks?			
17 a6	Does the Entity allow downstream relationships with Foreign Banks?			
17 a7	Does the Entity have processes and procedures in place to identify downstream relationships with Foreign Banks?			
17 a8	Does the Entity offer correspondent banking services to regulated MSBs/MVTS?			
17 a9	Does the Entity allow downstream relationships with MSBs/MVTS?			
17 a10	Does the Entity have processes and procedures in place to identify downstream relationships with MSB /MVTS?			
17 b	Private Banking (domestic & international)	Yes		
17 c	Trade Finance	No		
17 d	Payable Through Accounts	No		
17 e	Stored Value Instruments	No		
17 f	Cross Border Bulk Cash Delivery	No		
17 g	Domestic Bulk Cash Delivery	No		
17 h	International Cash Letter	No		
17 i	Remote Deposit Capture	No		
17 j	Virtual /Digital Currencies	No		
17 k	Low Price Securities	Yes		
17 I	Hold Mail	No		
17 m	Cross Border Remittances	Yes		
17 n	Service to walk-in customers (non-account holders)	No		
17 o	Sponsoring Private ATMs	No		
17 р	Other high risk products and services identified by the Entity			
18	Confirm that all responses provided in the above Section PRODUCTS & SERVICES are representative of all the LE's branches	Yes		
18 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.			
18 b	If appropriate, provide any additional information / context to the answers in this section.			

3. AML,	CTF & SANCTIONS PROGRAMME	
19	Does the Entity have a programme that sets	
19	minimum AML, CTF and Sanctions standards	
	regarding the following components:	
19 a	Appointed Officer with sufficient	Yes
	experience/expertise	163
19 b	Cash Reporting	Ven
		Yes
19 с	CDD	
		Yes
19 d	EDD	
		Yes
19 e	Beneficial Ownership	
		Yes
19 f	Independent Testing	
131	Independent resumg	Yes
10 -	Periodic Review	
19 g	Periodic Review	Yes
40 h	Delicina and Departures	
19 h	Policies and Procedures	Yes
19 i	Risk Assessment	Yes
19 j	Sanctions	Yes
19 k	PEP Screening	Yes
		res
19 I	Adverse Information Screening	
		Yes
19 m	Suspicious Activity Reporting	
		Yes
19 n	Training and Education	
		Yes
19 o	Transaction Monitoring	
	The second state of the se	Yes
20	How many full time employees are in the Entity's	
20	AML, CTF & Sanctions Compliance	10-50
	Department?	
21	Is the Entity's AML, CTF & Sanctions policy	
21	approved at least annually by the Board or	Yes
	equivalent Senior Management Committee?	165
22	Does the Board or equivalent Senior	
22	Management Committee receive regular	
	reporting on the status of the AML, CTF &	Annually
23	Sanctions programme? Does the Entity use third parties to carry out any	
23	components of its AML, CTF & Sanctions	No
	programme?	
22.0	If Y, provide further details	
23 a	If Y, provide further details	
24	Confirm that all responses provided in the above	
	Section AML, CTF & SANCTIONS Programme	Yes
	are representative of all the LE's branches	100
24 a	If N, clarify which questions the difference/s	
	relate to and the branch/es that this applies to.	
24 b	If appropriate, provide any additional information	
-45	/ context to the answers in this section.	
	Sometiment and another and and additional	

CBDDQ V1.3

4. AN	I BRIBERY & CORRUPTION	
25	Has the Entity documented policies and procedures consistent with applicable ABC regulations and requirements to [reasonably] prevent, detect and report bribery and corruption?	Yes
26	Does the Entity have an enterprise wide programme that sets minimum ABC standards?	Yes
27	Has the Entity appointed a designated officer or officers with sufficient experience/expertise responsible for coordinating the ABC programme?	Yes
28	Does the Entity have adequate staff with appropriate levels of experience/expertise to implement the ABC programme?	Yes
29	Is the Entity's ABC programme applicable to:	Both joint ventures and third parties acting on behalf of the Entity
30	Does the Entity have a global ABC policy that:	
30 a	Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage	
30 b	Includes enhanced requirements regarding interaction with public officials?	Yes
30 с	Includes a prohibition against the falsification of books and records (this may be within the ABC policy or any other policy applicable to the Legal Entity)?	Yes
31	Does the Entity have controls in place to monitor the effectiveness of their ABC programme?	Yes
32	Does the Entity's Board or Senior Management Committee receive regular Management Information on ABC matters?	Yes
33	Does the Entity perform an Enterprise Wide ABC risk assessment?	Yes
33 a	If Y select the frequency	12 Months
34	Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment?	Yes
35	Does the Entity's ABC EWRA cover the inherent risk components detailed below:	
35 a	Potential liability created by intermediaries and other third-party providers as appropriate	Yes
35 b	Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries	Yes
35 с	Transactions, products or services, including those that involve state-owned or state-controlled entities or public officials	Yes
35 d	Corruption risks associated with gifts and hospitality, hiring/internships, charitable donations and political contributions	Yes
35 e	Changes in business activities that may materially increase the Entity's corruption risk	Yes
36	Does the Entity's internal audit function or other independent third party cover ABC Policies and Procedures?	Yes

37	Does the Entity provide mandatory ABC training to:	
37 a	Board and senior Committee Management	Yes
37 b	1st Line of Defence	Yes
37 с	2nd Line of Defence	Yes
37 d	3rd Line of Defence	Yes
37 e	3rd parties to which specific compliance activities subject to ABC risk have been outsourced	Not Applicable
37 f	Non-employed workers as appropriate (contractors/consultants)	Yes
38	Does the Entity provide ABC training that is targeted to specific roles, responsibilities and activities?	No
39	Confirm that all responses provided in the above Section Anti Bribery & Corruption are representative of all the LE's branches	Yes
39 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
39 b	If appropriate, provide any additional information / context to the answers in this section.	

5. AMI	, CTF & SANCTIONS POLICIES & PROC	FOURES
40	Has the Entity documented policies and	LDOINEG
* "	procedures consistent with applicable AML, CTF	
l	& Sanctions regulations and requirements to	
	reasonably prevent, detect and report:	
40 a	Money laundering	Yes
		165
40 b	Terrorist financing	Yes
40 c	Sanctions violations	Yes
41	Are the Entity's policies and procedures updated	
*'	at least annually?	Yes
42	Are the Entity's policies and procedures gapped	
-	against/compared to:	
42 a	US Standards	No
		INO
42 a1	If Y, does the Entity retain a record of the	
	results?	
42 b	EU Standards	No
42 b1	If Y, does the Entity retain a record of the	
42 D I	results?	
43	Does the Entity have policies and procedures	
_	that:	
43 a	Prohibit the opening and keeping of anonymous	Yes
	and fictitious named accounts	103
43 b	Prohibit the opening and keeping of accounts for	Yes
	unlicensed banks and/or NBFIs	
43 c	Prohibit dealing with other entities that provide banking services to unlicensed banks	Yes
43 d	Prohibit accounts/relationships with shell banks	
75 u	Torrible dodourno/relationarips with arien barika	Yes
43 e	Prohibit dealing with another entity that provides	
	services to shell banks	Yes
43 f	Prohibit opening and keeping of accounts for	Yes
	Section 311 designated entities	103
43 g	Prohibit opening and keeping of accounts for any	
	of unlicensed/unregulated remittance agents, exchanges houses, casa de cambio, bureaux de	Yes
	change or money transfer agents	
43 h	Assess the risks of relationships with domestic	
	and foreign PEPs, including their family and	Yes
	close associates	
43 i	Define escalation processes for financial crime	Yes
	rlsk issues	
43 j	Define the process, where appropriate, for terminating existing customer relationships due	Yes
	to financial crime risk	Yes
43 k	Specify how potentially suspicious activity	
	identified by employees is to be escalated and	Yes
	investigated	
43	Outline the processes regarding screening for	Yes
	sanctions, PEPs and negative media	100
43 m	Outline the processes for the maintenance of	Yes
14	internal "watchlists" Has the Entity defined a risk tolerance statement	
44	or similar document which defines a risk	Yes
	boundary around their business?	100
45	Does the Entity have a record retention	V.
	procedures that comply with applicable laws?	Yes
45 a	If Y, what is the retention period?	5 years or more
		o yours or more
46	Confirm that all responses provided in the above	W
	Section POLICIES & PROCEDURES are representative of all the LE's branches	Yes
16 a	If N, clarify which questions the difference/s	
	relate to and the branch/es that this applies to.	
16 b	If appropriate, provide any additional information	
	/ context to the answers in this section.	

6. AML	, CTF & SANCTIONS RISK ASSESSMENT	
47	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:	
47 a	Client	Yes
47 b	Product	Yes
47 c	Channel	Yes
47 d	Geography	Yes
48	Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below:	
48 a	Transaction Monitoring	Yes
48 b	Customer Due Diligence	Yes
48 c	PEP Identification	Yes
48 d	Transaction Screening	Yes
48 e	Name Screening against Adverse Media & Negative News	Yes
48 f	Training and Education	Yes
48 g	Governance	Yes
48 h	Management Information	Yes
49	Has the Entity's AML & CTF EWRA been completed in the last 12 months?	Yes
49 a	If N, provide the date when the last AML & CTF EWRA was completed.	
50	Does the Entity's Sanctions EWRA cover the inherent risk components detailed below:	
50 a	Client	Yes
50 b	Product	Yes
50 с	Channel	Yes
50 d	Geography	Yes

51	Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below:	
51 a	Customer Due Diligence	Yes
51 b	Transaction Screening	Yes
51 c	Name Screening	Yes
51 d	List Management	Yes
51 e	Training and Education	Yes
51 f	Governance	Yes
51 g	Management Information	Yes
52	Has the Entity's Sanctions EWRA been completed in the last 12 months?	Yes
52 a	If N, provide the date when the last Sanctions EWRA was completed.	
53	Confirm that all responses provided in the above Section AML, CTF & SANCTIONS RISK ASSESSMENT are representative of all the LE's branches	Von
53 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
53 b	If appropriate, provide any additional information / context to the answers in this section.	

7 KYC	, CDD and EDD	
54	Does the Entity verify the identity of the	
	customer?	Yes
55	Do the Entity's policies and procedures set out when CDD must be completed, e.g. at the time of onboarding or within 30 days	Yes
56	Which of the following does the Entity gather and retain when conducting CDD? Select all that apply:	
56 a	Ownership structure	Yes
56 b	Customer identification	Yes
56 с	Expected activity	Yes
56 d	Nature of business/employment	Yes
56 e	Product usage	Yes
56 f	Purpose and nature of relationship	Yes
56 g	Source of funds	Yes
56 h	Source of wealth	Yes
57	Are each of the following identified:	
57 a	Ultimate beneficial ownership	Yes
57 a1	Are ultimate beneficial owners verified?	Yes
57 b	Authorised signatories (where applicable)	Yes
57 c	Key controllers	Yes
57 d	Other relevant parties	Yes
58	What is the Entity's minimum (lowest) threshold applied to beneficial ownership identification?	10%
59	Does the due diligence process result in customers receiving a risk classification?	Yes

60	If Y, what factors/criteria are used to determine the customer's risk classification? Select all that apply:	
60 a	Product Usage	Yes
60 b	Geography	Yes
60 c	Business Type/Industry	Yes
60 d	Legal Entity type	No
60 e	Adverse Information	Yes
60 f	Other (specify)	
61	Does the Entity have a risk based approach to screening customers for adverse media/negative news?	Yes
62	If Y, is this at:	
62 a	Onboarding	Yes
62 b	KYC renewal	Yes
62 c	Trigger event	Yes
63	What is the method used by the Entity to screen for adverse media / negative news?	Combination of automated and manual
64	Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?	Yes
65	If Y, is this at:	
65 a	Onboarding	Yes
65 b	KYC renewal	Yes
65 c	Trigger event	Yes
66	What is the method used by the Entity to screen PEPs?	Combination of automated and manual
67	Does the Entity have policies, procedures and processes to review and escalate potential matches from screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?	Yes
68	Does the Entity have a process to review and update customer information based on:	
68 a	KYC renewal	Yes
68 b	Trigger event	Yes
69	Does the Entity maintain and report metrics on current and past periodic or trigger event due diligence reviews?	Yes

	ne	
70	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?	
70 a	Non-account customers	Prohibited
70 b	Non-resident customers	EDD on a risk based approach
70 c	Shell banks	Prohibited
70 d	MVTS/ MSB customers	Prohibiled
70 e	PEPs	EDD & restricted on a risk based approach
70 f	PEP Related	EDD & restricted on a risk based approach
70 g	PEP Close Associate	EDD & restricted on a risk based approach
70 h	Correspondent Banks	EDD on a risk based approach
70 h1	If EDD or EDD & restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2014?	Yes
70 i	Arms, defense, military	Prohibited
70 j	Atomic power	Prohibited
70 k	Extractive industries	EDD & restricted on a risk based approach
70 I	Precious metals and stones	EDD & restricted on a risk based approach
70 m	Unregulated charities	EDD & restricted on a risk based approach
70 n	Regulated charities	EDD & restricted on a risk based approach
70 o	Red light business / Adult entertainment	Prohibited
70 p	Non-Government Organisations	EDD & restricted on a risk based approach
70 q	Virtual currencies	Prohibited
70 r	Marijuana	Prohibited
70 s	Embassies/Consulates	EDD & restricted on a risk based approach
70 t	Gambling	Prohibited
70 u	Payment Service Provider	Prohibited
70 v	Other (specify)	
71	If restricted, provide details of the restriction	Restricted to the activities approved by Crédit Agricole SA, examples: for extractive industries, only those that are non-polluting; for precious metals and stones, for charities, for Non-Government Organisation and for embassies / consulates, only those installed in Monaco.
72	Does the Entity perform an additional control or quality review on clients subject to EDD?	Yes
73	Confirm that all responses provided in the above Section KYC, CDD and EDD are representative of all the LE's branches	
73 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to	
73 b	If appropriate, provide any additional information / context to the answers in this section.	Customers database is screened daily against International Sanctions, weekly against negative information and monthly against PEP.

74	Does the Entity have risk based policies,	
	procedures and monitoring processes for the	Yes
75	What is the method used by the Entity to monitor transactions for suspicious activities?	Combination of automated and manual
76	If manual or combination selected, specify what type of transactions are monitored manually	First, the suspicious activies are identified automatically. Then, they are analysed manually. And the reporting is done manually.
77	Does the Entity have regulatory requirements to report suspicious transactions?	Yes
77 a	If Y, does the Entity have policies, procedures and processes to comply with suspicious transaction reporting requirements?	Yes
78	Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity?	Yes
79	Confirm that all responses provided in the above Section MONITORING & REPORTING are representative of all the LE's branches	Yes
79 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to	
79 b	If appropriate, provide any additional information / context to the answers in this section.	

NATIONAL PROPERTY.	PAYMENT TRANSPARENCY		
80	Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards?	Yes	
B1	Does the Entity have policies, procedures and processes to [reasonably] comply with and have controls in place to ensure compliance with:		
81 a	FATF Recommendation 16	Yes	
81 b	Local Regulations	Yes	
81 b1	Specify the regulation	Loi 1462 du 28/06/2018 (Monaco) renforçant le dispositif de lutte contrre le blanchiment de capitaux, le financement du terrorisme et la corruption.	
81 c	If N, explain		
82	Does the Entity have processes in place to respond to Request For Information (RFIs) from other entities in a timely manner?	Yes	
83	Does the Entity have controls to support the inclusion of required and accurate originator information in international payment messages?	Yes	
84	Does the Entity have controls to support the inclusion of required beneficiary information international payment messages?	Yes	
85	Confirm that all responses provided in the above Section PAYMENT TRANSPARENCY are representative of all the LE's branches	Yes	
85 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to		
85 b	If appropriate, provide any additional information / context to the answers in this section.		

Does the Entity have a Sanctions Policy approved by management regarding compliance with sanctions law applicable to the Entity, including with respect to business conducted with, or through accounts held at foreign financial institutions. 77 Does the Entity have policies, procedure, or the use of another entity accounts or early established to the other entity control to the use of another entity accounts or early established to the other entity (including prohibitions spitcable to the other entity (including prohibitions spitcable to the other entity (including prohibitions within the other entity (including prohibitions probables) and or detect actions taken to swate applicable ready to detect actions actions and or masking, of a anothers related to the sanctions and actions actions and actions actions actions and actions	10. S	0. SANCTIONS			
sproved by management regarding compliance with sanctions law applicable to the Entity, including with respect its business conducted with, or through accounts held at foreign financial matthions? 70 Does the facility have policies, procedures or the use of another entity for violate sanctions prohibitions applicable to the other entity for ulciding prohibitions within the other entity for ulciding prohibitions and surpling or the result within the other entity for ulciding prohibitions and prohibitions, such as dripping, or the result wise in the facility of the entity are considered by the Entity are prohibitions, such as dripping, or the result wise in the entity and the entity are entitled to the entity and the entity are entity and the entity and the entity are entity and the entity are entity and the entity and the entity are entity and the enti	86				
with sanctions law applicable to the Entity, including with respect to business conducted with, or through accounts held at foreign francial institutions? 70 Does the Entity have policies, procedures, or other control reasonably designed to prevent in a manner causing the other entity to violate sanctions prohibitions applicable to the other entity (including prohibitions spiciable to the other entity (including prohibitions within the other entity (including prohibitions within the other entity (including prohibitions spiciable spanitors prohibitions spicial signature). 80 Does the Entity have policies, procedures or other controls reasonably designed to prohibit and/or detect actions taken to evade applicable spanitors prohibitions, such as shipping, or the resolutions on and or making, of sanctions transactions are prohibitions, such as shipping, or the resolutions on an accordance of the control reasonably designed to prohibit and/or detect actions taken to evade applicable spanitors prohibitions, such as shipping, or the resolutions of the entity of the ent	00				
including with respect its business conducted with, or through accounts hed at foreign financial with, or through accounts hed at foreign financial institutions? Does the Entity have policies, procedures, or other control or accounts or services in a manner causing the other entity to violate another entity accounts or services in a manner causing the other entity to violate another control or control or seasonably designed to prevent the use of another entity and the other entity counting prohibition to other entity or violate another controls reasonably designed to prohibit and/or detect actions taken to evade applicable sanctions prohibitions, such as shipping, or the resubmission and/or masking, of sanctions relevant information in cross border transactions? Does the Entity screen its customers, including beneficial ownership information collected by the general sanctions and or masking, of sanctions and transactions? Automated Does the Entity screen atl sanctions relevant data, including at a minimum, entity and location information, contained in cross border transactions against Sanctions Lists? What is the method used by the Entity? What is the method used by the Entity? What is the method used by the Entity? Automated The object of the Sanctions Lists used by the Entity in its sanctions screening processes. The sanctions according processes. Consolidated United Nations Security Council Sanctions List (IVI) Juried States Department of the Treasury's Office of Foreign Assets Control (CFAC) The Office of For					
with, or through accounts held at foreign financial institutions? 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 thorie entity's location and the control of			Yes		
institutions? Does the Entity have policies, procedures, or other controls reasonably designed to prevent the use of another entity's oviciety and another entity to viciety and the use of another entity to viciety and the use of another entity to viciety and the use of another entity of viciety and the use of the entity (including prohibitors within the other entity (including prohibitors) and/or nations, or another entity (including prohibitors) and/or nations, or another entity designed to evide applicable anothers prohibitors, such as stripping, or the resubmission and/or masking, of sanctions relevant information in cross border transactions? Does the Entity screen its customers, including beneficial ownership information collected by the Entity? Does the Entity screen als paractions relevant data, including at a minimum, entity and location information, contained in cross border transactions against Sanctions Lists via the method used by the Entity? Automated 10 What is the method used by the Entity? Automated Yes 11 Does the Entity screen als paractions relevant data, including at a minimum, entity and location information, contained in cross border transactions against Sanctions Lists used by the Entity? Automated 12 What is the method used by the Entity? 13 Select the Sanctions Lists used by the Entity of the Sanctions Security Council Sanctions are secured to the Sanctions Security Council Sanctions Security Counci	l				
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 where entity including prohibitions within the other entity to violate another search by the entity are policies, procedures or other controls reasonably designed to prohibit seanctions prohibitions acts as shipping or the result-mission and/or masking, of sanctions relevant information in cross border result-mission and/or masking, of sanctions relevant information in cross border transactions? Does the Entity screen all sanctions relevant data, including beneficial ownership information collected by the Entity. What is the method used by the Entity? Used for screening customers and beneficial owners and for filtering transactional data by the control (OFAC) office of Financial Sanctions Interest used by the Entity of the	I				
the use of another entity to violate sanctions prohibitions and prohibitions applicable to the other entity (including prohibitions within the other entity (including prohibitions) and or other controls reasonably designed to prohibit and/or detect actions taken to evade applicable senctions prohibitions, such as surpping, or the resubmission and/or masking, of sanctions elevans information in cross border entity, during orboparding and regularly thereafter against Sanctions relevant data, including at a minimum attention of the prohibition information, contained in cross border transactions against Sanctions Lists and the prohibition information, contained in cross border transactions against Sanctions Lists and the prohibition information, contained in cross border transactions against Sanctions Lists and the prohibition of the proh	-				
the use of another entity's accounts or services in a manner causing the other entity to tother entity to including prohibitions applicable to the other entity (including prohibitions within the other entity (including prohibitions within the other entity (including prohibitions within the other entity is coal jurisdiction)? 38 Does the Entity have polices, procedures or other controls reasonably designed to prohibit and/or detect actions taken to evade applicable sanctions prohibitions, such as stipping, or the resubmission and/or masking, of sanctions relevant information in cross border transactions? 39 Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during orbizorating and regularly thereafter signant Sanctions relevant information, container or cross border information i	87				
In a manner causing the other entity to violate senctions prohibitions suplain the other entity (including prohibitions within the other entity (colour jurisdictions). Boes the Entity have policies, procedures or other controls reasonably designed to prohibit and/or detect actions taken to evade applicable senctions prohibitions, and as stripping, or the resubmission and/or masking, of senctions elevant information in costs border present including a control information of the prohibition of the prohi					
sanctions prohibitions applicable to the other entity (notuding prohibitions within the other entity's local jurisdiction)? 38 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 making, of sanctions relevant information in cross border transactions? 39 Does the Entity screen its customers, including beneficial coverable information collected by the Entity, during orboarding and regularly thereafter against Sanctions LISE? 40 What is the method used by the Entity? 41 Does the Entity screen at sanctions relevant data, including at a minimum, entity and location information, contained in cross border transactions against Sanctions LISE? 42 What is the method used by the Entity? 43 Select the Sanctions LISE? 44 Automated 53 Select the Sanctions LISE? 54 Consolidated United Nations Security Council Used for screening customers and beneficial cowners and for filtering transactional data Consolidated United Nations Security Council Used for screening customers and beneficial cowners and for filtering transactional data Consolidated Conso	l				
entity (including prohibitions within the other entity's local jurisdiction)? 18 Does the Entity have policies, procedures or other controls resonably 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? 19 Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during orboxarding and regularly thereafter against Sanctions Lists? 10 What is the method used by the Entity? 10 Does the Entity screen all sanctions relevant data, including at a minimum, entity and location information, contained in cross border transactions against Sanctions Lists? 11 Destity and including at a minimum, entity and location information, contained in cross border transactions against Sanctions Lists? 12 What is the method used by the Entity? 13 Select the Sanctions Lists used by the Entity? 14 Select the Sanctions Lists used by the Entity in the sanctions screening processes: 15 Consolidated United Nations Security Council Sanctions List (UN) 15 United States Department of the Treasury's Office of Foreign Assets Control (OFAC) 16 United States Department of the Treasury's Office of Foreign Assets Control (OFAC) 17 Used for screening customers and beneficial owners and for filtering transactional data 18 Used for screening customers and beneficial owners and for filtering transactional data 19 Used for screening customers and beneficial owners and for filtering transactional data 19 Used for screening customers and beneficial owners and for filtering transactional data 20 Office of Financial Sanctions implementation 21 Not used 22 Very or the minimum, and for automated screening systems against: 23 Consolidated United National Sanctions implementation of the screening systems against: 24 Customer Data 25 Same day to 2 business days 26 business days	l	in a manner causing the other entity to violate	Yes		
entity's local jurisdiction)? 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? Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists? What is the method used by the Entity? Automated Does the Entity screen all sanctions relevant data, including at a minimum, entity and location information, contained in cross border transactions against Sanctions Lists? What is the method used by the Entity? What is the method used by the Entity? Automated Automated Automated Automated Automated What is the method used by the Entity in its sanctions screening processes: Select the Sanctions List (UN) Solect the Sanctions List (UN) Used for screening customers and beneficial owners and for filtering transactional data Sanctions List (UN) Used for screening customers and beneficial owners and for filtering transactional data Office of Foreign Assets Control (OFAC) Office of Financial Sanctions implementation HMT (OFS) Used for screening customers and beneficial owners and for filtering transactional data Office of Financial Sanctions implementation HMT (OFS) Cher (specify) France and Monacco When regulatory authorities make updates to their Sanctions list, two many business days before the entity updates their active manual and/or automated screening systems against: Same day to 2 business days Same day to 2 business days	l				
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 or conso border transactions? Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists? What is the method used by the Entity and location information, contained in cross border transactions against Sanctions Lists? What is the method used by the Entity? What is the method used by the Entity of the sanctions section information, contained in cross border transactions against Sanctions Lists? What is the method used by the Entity of the sanctions secretic transactions against Sanctions Lists? What is the method used by the Entity of the sanctions secretic transactions against Sanctions Lists? What is the method used by the Entity of the sanctions secretic transactions against Sanctions Lists? Used for screening customers and beneficial owners and for filtering transactional data Select the Sanctions List used by the Entity in the sanctions List (UN) Used for screening customers and beneficial owners and for filtering transactional data Mot used Lists maintained by other G7 member countries HMT (CFSI) Guestion removed 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: Same day to 2 business days before the entity updates their active manual and/or automated screening systems against:	l	entity (including prohibitions within the other			
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? 19 Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and requiarly thereafter against Sanctions Lists? 10 What is the method used by the Entity? 11 Does the Entity screen all sanctions relevant data, including at a minimum, entity and location information, contained in cross border transactions against Sanctions Lists? 12 What is the method used by the Entity? 13 Select the Sanctions List used by the Entity in its sanctions screening processes: 13 Consolidated United Nations Security Council Sanctions List (UN) 13 United States Department of the Treasury's Office of Foreign Assets Control (DFAC) 13 Coffice of Foreign Assets Control (DFAC) 13 Coffice of Francial Sanctions implementation Not used 14 Question removed 15 When regulatory authorities make updates to their Sanctions list, how many business days before the entity updates their active manual and/or authomated screening systems against: 5 Customer Data Same day to 2 business days Same day to 2 business days		entity's local jurisdiction)?			
and/or detect actions taken to evade applicable senctions prohibitions, such as stripping, or the resubmission and/or masking, of sanctions relevant information to ross border transactions? 30 Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during orboarding and regularly therafter against Sanctions Lists? 40 What is the method used by the Entity? 41 Does the Entity screen all sanctions relevant data, including at a minimum, entity and location information, contained in cross border transactions against Sanctions Lists? 4 What is the method used by the Entity in its sanctions screening processes: 5 United States Department of the Treasury's Office of Friegria Sanctions List (UN) 5 United States Department of the Treasury's Office of Friegria Sanctions Inplementation HMT (GFSI) 5 United States Department of the Treasury's Office of Friegria Sanctions Implementation HMT (GFSI) 5 United States Department of the Treasury's Office of Friegria Sanctions Implementation HMT (GFSI) 5 United States Department of the Treasury's Office of Friegria Sanctions Implementation HMT (GFSI) 5 United States Department of the Treasury's Office of Friegria Sanctions Implementation HMT (GFSI) 5 United States Department of the Treasury's Office of Friegria Sanctions Implementation HMT (GFSI) 5 United States Department of the Treasury's Office of Friegria Sanctions International Against Sanctions	88	Does the Entity have policies, procedures or			
sanctions prohibitions, such as stripping, of the resubmission and/or masking, of sanctions relevant information in cross border transactions? 39 Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists? 30 What is the method used by the Entity? 31 Does the Entity screen all sanctions relevant data, including at a minimum, entity and location information, contained in cross border transactions against Sanctions Lists? 32 What is the method used by the Entity in its sanctions screening processes: 33 Select the Sanctions List used by the Entity in its sanctions screening processes: 34 Consolidated United Nations Security Council Sanctions List (UN) 35 United States Department of the Treasury's Office of Froreign Assets Control (OFAC) 36 Office of Froreign Assets Control (OFAC) 37 United States Department of the Treasury's Office of Froreign Assets Control (OFAC) 38 European Union Consolidated List (EU) 39 Used for screening customers and beneficial owners and for filtering transactional data Not used Not used Not used Other (specify) France and Monaco 4 Question removed When regulatory authorities make updates to their Sanctions its, how many business days before the entity updates their active manual and/or automated screening systems against: Same day to 2 business days Same day to 2 business days	ı	other controls reasonably designed to prohibit			
sanctions prohibitions, such as stripping, of the resubmission and/or masking, of sanctions relevant information in cross border transactions? 39 Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists? 30 What is the method used by the Entity? 31 Does the Entity screen all sanctions relevant data, including at a minimum, entity and location information, contained in cross border transactions against Sanctions Lists? 32 What is the method used by the Entity in its sanctions screening processes: 33 Select the Sanctions List used by the Entity in its sanctions screening processes: 34 Consolidated United Nations Security Council Sanctions List (UN) 35 United States Department of the Treasury's Office of Froreign Assets Control (OFAC) 36 Office of Froreign Assets Control (OFAC) 37 United States Department of the Treasury's Office of Froreign Assets Control (OFAC) 38 European Union Consolidated List (EU) 39 Used for screening customers and beneficial owners and for filtering transactional data Not used Not used Not used Other (specify) France and Monaco 4 Question removed When regulatory authorities make updates to their Sanctions its, how many business days before the entity updates their active manual and/or automated screening systems against: Same day to 2 business days Same day to 2 business days	ı	and/or detect actions taken to evade applicable			
resubmission and/or masking, of sanctions relevant information in cross border transactions? Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists? What is the method used by the Entity? Automated What is the method used by the Entity? Automated What is the method used on the Entity? What is the method used by the Entity of transactions against Sanctions against Sanctio			Yes		
relevant information in cross border transactions? Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists? What is the method used by the Entity? Does the Entity screen all sanctions relevant data, including at a minimum, entity and location information, contained in cross border transactions against Sanctions Lists? What is the method used by the Entity? Automated Justice of transactions against Sanctions Lists? What is the method used by the Entity? What is the method used by the Entity? Under Sanctions Lists used by the Entity? Justice of Sanctions Lists used by the Entity in its sanctions creening processes: Justice of Considered United Nations Security Council Sanctions List (UN) Justice States Department of the Treasury's Office of Foreign Assets Control (OFAC) Justice o	ı		1		
transactions? Does the Entity screen all scustomers, including beneficial ownership information collected by the Entity, during onboarding and requiarly thereafter against Sanctions Lists? Does the Entity screen all sanctions relevant data, including at a minimum, entity and location information, contained in cross border transactions against Sanctions Lists? What is the method used by the Entity? What is the method used by the Entity in its sanctions against Sanctions Lists? What is the method used by the Entity in its sanctions screening processes: Select the Sanctions Lists used by the Entity in its sanctions screening processes: Solect States Department of the Treasury's Office of Foreign Assets Control (OFAC) Office of Foreign Assets Control (OFAC) Company Union Consolidated List (EU) Used for screening customers and beneficial owners and for filtering transactional data Not used Lists maintained by other G7 member countries Other (specify) France and Monaco Transactions Same day to 2 business days Same day to 2 business days Same day to 2 business days	ı				
Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists? What is the method used by the Entity? Automated Does the Entity screen all sanctions relevant data, including at a minimum, entity and location information, contained in cross border transactions against Sanctions Lists? What is the method used by the Entity? Automated Automated Automated Automated Automated Select the Sanctions Lists used by the Entity in its sanctions screening processes: Sanctions screening processes: Consolidated United Nations Security Council Sanctions List (IV) United States Department of the Treasury's Office of Foreign Assets Control (OFAC) Office of Firancial Sanctions implementation HMT (OFS) Automated Used for screening customers and beneficial owners and for filtering transactional data Not used Not used Used for screening customers and beneficial owners and for filtering transactional data Not used Office of Firancial Sanctions implementation HMT (OFS) Automated Not used Not used Office of Firancial Sanctions implementation HMT (OFS) Automated Not used Not used Office of Firancial Sanctions implementation HMT (OFS) Office of Firancial Sanctions implementation HMT (OFS) Office of Firancial Sanctions implementation HMT (OFS) When regulatory authorities make updates to their Sanctions ilst, how many business days before the entity updates their active manual and/or automated screening systems against: 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: Same day to 2 business days					
beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists? What is the method used by the Entity? Automated Does the Entity screen all sanctions relevant data, including at a minimum, entity and location information, contained in cross border transactions against Sanctions Lists? What is the method used by the Entity? Automated Automated Automated Automated Ves Select the Sanctions Lists used by the Entity? Automated Select the Sanctions Lists used by the Entity? Automated Used for screening customers and beneficial owners and for filtering transactional data Sanctions List (UN) Used for screening customers and beneficial owners and for filtering transactional data Used for screening customers and beneficial owners and for filtering transactional data Used for screening customers and beneficial owners and for filtering transactional data Used for screening customers and beneficial owners and for filtering transactional data Not used Lists maintained by other G7 member countries Other (specify) France and Monaco 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: Same day to 2 business days Same day to 2 business days	00				
Entity, during ontboarding and regularly thereafter against Sanctions Lists? Automated Does the Entity screen all sanctions relevant data, including at a minimum, entity and location information, contained in cross border transactions against Sanctions Lists? What is the method used by the Entity? Automated Yes Automated Office of Financial Sanctions Lists? Used for screening customers and beneficial owners and for filtering transactional data United States Department of the Treasury's Office of Foreign Assets Control (OFAC) Office of Financial Sanctions implementation HMT (OFS) But Corsolidated List (EU) Used for screening customers and beneficial owners and for filtering transactional data Not used Used for screening customers and beneficial owners and for filtering transactional data Not used Office of Financial Sanctions implementation HMT (OFS) Automated Ves Automated Ves Automated Ves Automated Automated Ves Automated Ves Automated Automated Ves Automated Automated Ves Automated Automated Ves Automated Ves Automated Automated Automated Automated Ves Automated Automated Automated Automated Automated Automated Ves Used for screening customers and beneficial owners and for filtering transactional data Not used Other (specify) France and Monaco 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: Same day to 2 business days Same day to 2 business days	109				
against Sanctions Lists? What is the method used by the Entity? Does the Entity screen all sanctions relevant data, including at a minimum, entity and location information, contained in cross border transactions against Sanctions Lists? What is the method used by the Entity? What is the method used by the Entity? What is the method used by the Entity? Select the Sanctions Lists used by the Entity in its sanctions screening processes: Journal of Sanctions Lists used by the Entity in its sanctions screening processes: Journal of Sanctions List (UN) Used for screening customers and beneficial owners and for filtering transactional data United States Department of the Treasury's Office of Foreign Assets Control (OFAC) Journal of the Treasury's Office of Foreign Assets Control (OFAC) Coffice of Financial Sanctions Implementation HMT (OFSI) Lists maintained by other G7 member countries What is the method used by the Entity plant is sanctions and beneficial owners and for filtering transactional data Not used Other (specify) France and Monaco 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: 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: Same day to 2 business days			Yes		
What is the method used by the Entity? Automated Does the Entity screen all sanctions relevant data, including at a minimum, entity and location information, contained in cross border transactions against Sanctions Lists? What is the method used by the Entity? Select the Sanctions Lists used by the Entity in its sanctions screening processes: Select the Sanctions Lists used by the Entity in its sanctions screening processes: Consolidated United Nations Security Council Sanctions List used National Sanctions List (UN) Used for screening customers and beneficial owners and for filtering transactional data Coffice of Fioragia Assets Control (OFAC) Coffice of Fioragia Sanctions Implementation HMT (OFS) European Union Consolidated List (EU) Used for screening customers and beneficial owners and for filtering transactional data Lists maintained by other G7 member countries Not used Other (specify) France and Monaco When regulatory authorities make updates to their Sanctions is her active manual and/or automated screening systems against: Same day to 2 business days Same day to 2 business days					
Automated Automated Automated Automated Automated Automated Does the Entity screen all sanctions relevant data, including at a minimum, entity and location information, contained in cross border transactions against Sanctions Lists? What is the method used by the Entity? Automated Select the Sanctions Lists used by the Entity in its sanctions screening processes: Automated Select the Sanctions List used by the Entity in its sanctions screening processes: Automated Used for screening customers and beneficial owners and for filtering transactional data Social States Department of the Treasury's Office of Foreign Assets Control (OFAC) Office of Foreign Assets Control (OFAC) Office of Financial Sanctions Implementation HMT (OFS) Automated Used for screening customers and beneficial owners and for filtering transactional data Used for screening customers and beneficial owners and for filtering transactional data Not used Used for screening customers and beneficial owners and for filtering transactional data Not used Other (specify) France and Monaco 4. Ouestion removed 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: Same day to 2 business days Same day to 2 business days					
Does the Entity screen all sanctions relevant data, including at a minimum, entity and location information, contained in cross border transactions against Sanctions Lists? What is the method used by the Entity? Select the Sanctions Screening processes: Cansolidated United Nations Security Council Sanctions List (UN) United States Department of the Treasury's Office of Foreign Assets Control (DFAC) Coffice of Foreign Assets Control (DFAC) Used for screening customers and beneficial owners and for filtering transactional data Used for screening customers and beneficial owners and for filtering transactional data Used for screening customers and beneficial owners and for filtering transactional data Used for screening customers and beneficial owners and for filtering transactional data Used for screening customers and beneficial owners and for filtering transactional data Used for screening customers and beneficial owners and for filtering transactional data Used for screening customers and beneficial owners and for filtering transactional data Used for screening customers and beneficial owners and for filtering transactional data Other (specify) France and Monaco Used for screening customers and beneficial owners and for filtering transactional data Not used Other (specify) France and Monaco 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: Same day to 2 business days	90	What is the method used by the Entity?	Automated		
data, including at a minimum, entity and location information, contained in cross border transactions against Sanctions Lists? What is the method used by the Entity? Automated Select the Sanctions Lists used by the Entity in its sanctions screening processes: Used for screening customers and beneficial owners and for filtering transactional data United States Department of the Treasury's Office of Foreign Assets Control (OFAC) Coffice of Foreign Assets Control (OFAC) Coffice of Financial Sanctions Implementation HMT (OFSI) Used for screening customers and beneficial owners and for filtering transactional data Not used Used for screening customers and beneficial owners and for filtering transactional data Not used Used for screening customers and beneficial owners and for filtering transactional data Not used Used for screening customers and beneficial owners and for filtering transactional data Not used Used for screening customers and beneficial owners and for filtering transactional data Not used Used for screening customers and beneficial owners and for filtering transactional data Not used Other (specify) France and Monaco 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: Same day to 2 business days Same day to 2 business days			Automateu		
information, contained in cross border transactions against Sanctions Lists? What is time method used by the Entity? 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 filtering transactional data Used for screening customers and beneficial owners and for filtering transactional data Office of Friends Sanctions Implementation HMT (OFS) Used for screening customers and beneficial owners and for filtering transactional data Used for screening customers and beneficial owners and for filtering transactional data Not used Used for screening customers and beneficial owners and for filtering transactional data Not used Used for screening customers and beneficial owners and for filtering transactional data Not used Other (specify) France and Monaco 4. Question removed 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: Customer Data Same day to 2 business days Francations Sanctions list.	91	Does the Entity screen all sanctions relevant			
Information, contained in cross border transactions against Sanctions Lists? What is the method used by the Entity? Automated Select the Sanctions Lists used by the Entity in its sanctions screening processes: Used for screening customers and beneficial owners and for filtering transactional data control of Foreign Assets Control (OFAC) Coffice of Foreign Assets Control (OFAC) Coffice of Financial Sanctions Implementation HMT (OFS) Not used Custom removed Cother (specify) France and Monaco Custom removed 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 agains: Customer Data Same day to 2 business days Same day to 2 business days	l	data, including at a minimum, entity and location	L.		
Iransactions against Sanctions Lists?		information, contained in cross border	Yes		
What is the method used by the Entity? Automated 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 filtering transactional data Used for screening customers and beneficial owners and for filtering transactional data Used for screening customers and beneficial owners and for filtering transactional data Used for screening customers and beneficial owners and for filtering transactional data Office of Financial Sanctions Implementation HMT (OFSI) Buropean Union Consolidated List (EU) Used for screening customers and beneficial owners and for filtering transactional data Not used Used for screening customers and beneficial owners and for filtering transactional data Not used Other (specify) France and Monaco 4 Question removed 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: 5 a Customer Data Same day to 2 business days Fransactions Transactions					
Select the Sanctions Lists used by the Enlity in its sanctions screening processes: 33 a Consolidated United Nations Security Council Sanctions List (UN) 33 b United States Department of the Treasury's Office of Foreign Assets Control (OFAC) 33 c Office of Foreign Assets Control (OFAC) 34 d European Union Consolidated List (EU) 35 d European Union Consolidated List (EU) 36 d European Union Consolidated List (EU) 37 d Used for screening customers and beneficial owners and for filtering transactional data 38 e Lists maintained by other G7 member countries 39 of Other (specify) 40 France and Monaco 41 Question removed 42 Question removed 43 f 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: 5 a Customer Data Same day to 2 business days Same day to 2 business days Same day to 2 business days	92				
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 Foreign Assets Control (OFAC) Office of Financial Sanctions Implementation HMT (OFSI) Lists maintained by other G7 member countries Other (specify) When regulatory authorities make updates to their Sanctions ist, how many business days before the entity updates their active manual and/or automated screening systems against: Customer Data Used for screening customers and beneficial owners and for filtering transactional data Used for screening customers and beneficial owners and for filtering transactional data Not used Not used Not used Other (specify) France and Monaco Sanctions list, how many business days before the entity updates their active manual and/or automated screening systems against: Customer Data Transactions Transactions	J.	Triatio the method abod by the Entry.	Automated		
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 Foreign Assets Control (OFAC) Office of Financial Sanctions Implementation HMT (OFSI) Lists maintained by other G7 member countries Other (specify) When regulatory authorities make updates to their Sanctions ist, how many business days before the entity updates their active manual and/or automated screening systems against: Customer Data Used for screening customers and beneficial owners and for filtering transactional data Used for screening customers and beneficial owners and for filtering transactional data Not used Not used Not used Other (specify) France and Monaco Sanctions list, how many business days before the entity updates their active manual and/or automated screening systems against: Customer Data Transactions Transactions	02	Calcut the Canations Lists word by the Calibria			
Consolidated United Nations Security Council Sanctions List (UN) Used for screening customers and beneficial owners and for filtering transactional data Used for screening customers and beneficial owners and for filtering transactional data Used for screening customers and beneficial owners and for filtering transactional data Used for screening customers and beneficial owners and for filtering transactional data Used for screening customers and beneficial owners and for filtering transactional data Not used Used for screening customers and beneficial owners and for filtering transactional data Not used Used for screening customers and beneficial owners and for filtering transactional data Not used Other (specify) France and Monaco 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: Customer Data Same day to 2 business days Fransactions Transactions	93				
Sanctions List (UN) Used for screening customers and beneficial owners and for filtering transactional data 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 Used for screening customers and beneficial owners and for filtering transactional data Not used Used for screening customers and beneficial owners and for filtering transactional data Not used Used for screening customers and beneficial owners and for filtering transactional data Not used Used for screening customers and beneficial owners and for filtering transactional data Not used Other (specify) France and Monaco 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: Customer Data Same day to 2 business days					
Sarictions List (OF)	93 a		Ilsed for screening customers and beneficial owners and for filtering transactional data		
Office of Foreign Assets Control (OFAC) Office of Financial Sanctions Implementation HMT (OFSI) Not used Used for screening customers and beneficial owners and for filtering transactional data Not used Used for screening customers and beneficial owners and for filtering transactional data Not used Used for screening customers and beneficial owners and for filtering transactional data Not used Other (specify) France and Monaco 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: Customer Data Same day to 2 business days Fransactions Transactions		1	Sacration and section and periodical candidates and an internal and analysis and add		
Office of Financial Sanctions Implementation HMT (OFSI) Other (Specify) France and Monaco 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: Customer Data Not used Same day to 2 business days	93 b		lead for property automore and beneficial support and for filtering transporting data		
HMT (OFSI) Not used European Union Consolidated List (EU) Used for screening customers and beneficial owners and for filtering transactional data Not used Other (specify) France and Monaco 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: Customer Data Not used Not used Not used Same day to 2 business days Same day to 2 business days		Office of Foreign Assets Control (OFAC)	osed for screening customers and behalicial owners and for littering transactional data		
HMT (OFSI) Not used European Union Consolidated List (EU) Used for screening customers and beneficial owners and for filtering transactional data Not used Other (specify) France and Monaco 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: Customer Data Not used Not used Not used Same day to 2 business days Same day to 2 business days	93 с	Office of Financial Sanctions Implementation			
European Union Consolidated List (EU) Used for screening customers and beneficial owners and for filtering transactional data Not used Other (specify) France and Monaco Used for screening customers and beneficial owners and for filtering transactional data Not used Other (specify) France and Monaco 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: Customer Data Same day to 2 business days Transactions			Not used		
Used for screening customers and beneficial owners and for filtering transactional data Not used Other (specify) France and Monaco 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: Customer Data Same day to 2 business days Fransactions	D3 4				
Lists maintained by other G7 member countries Not used Other (specify) France and Monaco Question removed 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: Customer Data Same day to 2 business days Transactions	93 u	European Onion Consolidated List (EO)	Used for screening customers and beneficial owners and for filtering transactional data		
Not used Other (specify) France and Monaco Question removed 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: Customer Data Same day to 2 business days Transactions	-				
Other (specify) France and Monaco Question removed 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: Customer Data Same day to 2 business days	93 e	Lists maintained by other G7 member countries	Notused		
France and Monaco 4 Question removed 5 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: 5 a Customer Data Same day to 2 business days 5 b Transactions			TWO USED		
4 Question removed 5 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: 5 a Customer Data Same day to 2 business days 5 b Transactions	93 f	Other (specify)			
4 Question removed 5 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: 5 a Customer Data Same day to 2 business days 5 b Transactions		1 "			
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: 5 a Customer Data Same day to 2 business days Transactions			France and Monaco		
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: 5 a Customer Data Same day to 2 business days Transactions					
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: 5 a Customer Data Same day to 2 business days Transactions					
their Sanctions list, how many business days before the entity updates their active manual and/or automated screening systems against: 5 a Customer Data Same day to 2 business days Transactions	94	Question removed			
their Sanctions list, how many business days before the entity updates their active manual and/or automated screening systems against: 5 a Customer Data Same day to 2 business days Transactions	111				
before the entity updates their active manual and/or automated screening systems against: 5 a Customer Data Same day to 2 business days 5 b Transactions	95	When regulatory authorities make updates to			
before the entity updates their active manual and/or automated screening systems against: 5 a Customer Data Same day to 2 business days 5 b Transactions		their Sanctions list, how many business days			
and/or automated screening systems against: 5 a Customer Data Same day to 2 business days 5 b Transactions					
5 a Customer Data Same day to 2 business days 5 b Transactions					
Same day to 2 business days 5 b Transactions	95 a				
5 b Transactions	u				
5 b Transactions		1	Same day to 2 business days		
			,		
Same day to 2 business days	95 b	Transactions			
Same day to 2 business days					
			Same day to 2 business days		

96	Does the Entity have a physical presence, e.g., branches, subsidiaries, or representative offices located in countries/regions against which UN, OFAC, OFSI, EU and G7 member countries have enacted comprehensive jurisdiction-based Sanctions?	No
97	Confirm that all responses provided in the above Section SANCTIONS are representative of all the LE's branches	Yes
97 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
97 b	If appropriate, provide any additional information / context to the answers in this section.	

	1. TRAINING & EDUCATION		
98	Does the Entity provide mandatory training, which includes :		
98 a	Identification and reporting of transactions to government authorities	Yes	
98 b	Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered	Yes	
98 c	Internal policies for controlling money laundering, terrorist financing and sanctions violations	Yes	
98 d	New issues that occur in the market, e.g., significant regulatory actions or new regulations	Yes	
98 e	Conduct and Culture	Yes	
99	Is the above mandatory training provided to		
99 a	Board and Senior Committee Management	Yes	
99 b	1st Line of Defence	Yes	
99 с	2nd Line of Defence	Yes	
99 d	3rd Line of Defence	Yes	
99 ө	3rd parties to which specific FCC activities have been outsourced	Yes	
99 f	Non-employed workers (contractors/consultants)	Yes	
100	Does the Entity provide AML, CTF & Sanctions training that is targeted to specific roles, responsibilities and high risk products, services and activities?	Yes	
101	Does the Entity provide customised training for AML, CTF and Sanctions staff?	Yes	
102	Confirm that all responses provided in the above Section TRAINING & EDUCATION are representative of all the LE's branches	Yes	
102 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to		
102 ь	If appropriate, provide any additional information / context to the answers in this section.		

103	Are the Entity's KYC processes and documents subject to quality assurance testing?	Yes
104	Does the Entity have a program wide risk based Compliance Testing process (separate to the independent Audit function)?	Yes
105	Confirm that all responses provided in the above Section QUALITY ASSURANCE / COMPLIANCE TESTING are representative of all the LE's branches	Yes
105 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
105 b	If appropriate, provide any additional information / context to the answers in this section.	

13. AL	3. AUDIT		
106	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 and Sanctions policies and practices on a regular basis?	Yes	
107	How often is the Entity audited on its AML, CTF & Sanctions programme by the following:		
107 a	Internal Audit Department	Component based reviews	
107 b	External Third Party	Yearly	
108	Does the internal audit function or other independent third party cover the following areas:		
100 a	AML, CTF & Sanctions policy and procedures	Yes	
108 b	KYC / CDD / EDD and underlying methodologies	Yes	
108 c	Transaction Monitoring	Yes	
108 d	Transaction Screening including for sanctions	Yes	
108 e	Name Screening & List Management	Yes	
108 f	Training & Education	Yes	
108 g	Technology	Yes	
108 h	Governance	Yes	
108 i	Reporting/Metrics & Management Information	Yes	
108 j	Suspicious Activity Filing	Yes	
108 k	Enterprise Wide Risk Assessment	Yes	
108 I	Other (specify)		
109	Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness?	Yes	
110	Confirm that all responses provided in the above	Yes	
110 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.		
110 Ь	If appropriate, provide any additional information / context to the answers in this section.		

Declaration Statement Wolfsberg Group Correspondent Banking Due Diligence Questionnaire 2020 (CBDDQ V1.3) 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) CFM Indosuez Weelth (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 obligations. The Financial Institution recognises the importance of transparency regarding parties to transpactions 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 on an annual basis. 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 on behalf of the Financial institution. Jean-Philippe ORY (MLRO or equivalent), 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 in behalf of the Financial institution. (Signature & Date)