

SFIL Group

Questionnaire on the mechanism for the prevention of money laundering and terrorist financing

Institution Name :

SFIL

Head office of the Institution:

1-3 rue du Passeur de Boulogne, 92130 Issy-les-Moulineaux

Legal form of the Institution :

Société Anonyme à Conseil d'Administration

Registration number in the Trade and Companies Registry:

428 782 585 RCS Nanterre

Website of the institution :

<https://sfil.fr/>

LEI number :

549300HFEHJOXGE4ZE63

Contact details regarding this questionnaire :

General Secretary

Head of Compliance

Béatrice Gosserez

Beatrice.gosserez@sfil.fr

+33(0)1 73 28 91 27

Institution Name :

Caisse Française de Financement Local (CAFFIL)

Head office of the Institution :

1-3 rue du Passeur de Boulogne, 92130 Issy-les-Moulineaux

Legal form of the Institution :

Société Anonyme à Directoire et Conseil de Surveillance

Registration number in the Trade and Companies Registry :

421 318 064 RCS Nanterre

Website of the institution :

<https://caissefrancaisedefinancementlocal.fr/>

LEI number :

549300E6W08778140W85

Contact details regarding this questionnaire :

General Secretary

Head of Compliance Department

Béatrice Gosserez

Beatrice.gosserez@sfil.fr

+33(0)1 73 28 91 27

GENERAL INFORMATION ON THE INSTITUTION :

The SFIL Group is composed of SFIL and its wholly-owned subsidiary, the Caisse Française de Financement Local («CAFFIL »).

SFIL was approved as a bank by the College of the French Prudential Control Authority (Autorité de contrôle prudentiel et de résolution) on January 16, 2013. Since its creation, the State has played a special role by having contributed 75% of the capital and provided the prudential authorities, as the reference shareholder, with a strong commitment of financial support, in compliance with banking regulations. Caisse des Dépôts et Consignations (CDC) has been a 100% shareholder of SFIL since September 30, 2020. This 100% public shareholding is one of the essential characteristics of the public development banking model in which SFIL operates.

SFIL holds 100% of the capital of Caisse Française de Financement Local (CAFFIL), its sole subsidiary, a specialized credit institution with the status of a *société de crédit foncier* (SCF) governed by Articles L.513-2 et seq. of the French Monetary and Financial Code.

SFIL is at the heart of a system that meets the State's desire to provide French local authorities and public healthcare institutions with long-term, efficient access to long-term bank financing, alongside the offers provided by commercial banks and French or European public institutions active in this segment. This mechanism, set up as part of the European Commission's decision of December 28, 2012, refinances La Banque Postale's French local public sector (LPS) lending activity.

Similarly, in 2015, the State entrusted SFIL with a second mission of public interest, consisting of refinancing export credit contracts insured by Bpifrance Assurance Export, thus contributing to improving the competitiveness of major export contracts of French companies. This refinancing scheme is open to all banks active in the European Union that are partners of French exporters for their credits insured by Bpifrance Assurance Export, in the name and on behalf of the French State. This refinancing facility, authorized by the European Commission on May 5, 2015, was renewed on May 7, 2020 for a period of 7 years.

1. Is the Institution regulated by a regulatory authority ?

SFIL		<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		CAFFIL		<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
Name of the supervisory authority	Autorité de Contrôle Prudentiel et de Résolution (ACPR)			Name of the supervisory authority	Autorité de Contrôle Prudentiel et de Résolution (ACPR)		
Approval number	53440			Approval number	9964		
Bank Code (CIB)	16588			Bank Code (CIB)	14388		

2. Main activities of your institution ?

- Private Banking
- Commercial banking operations
- Investment Services
- Financial Advice
- Asset Management
- Insurance
- Other :

SFIL	CAFFIL
<ul style="list-style-type: none"> ♦ Provision of loan management services to the local public sector ♦ Refinancing of major export contracts ♦ No account keeping and no payment services 	<ul style="list-style-type: none"> ♦ Unique activity of refinancing credits to public sector entities or within the framework of major export contracts through the issuance of covered bonds, called <i>obligations foncières</i> ♦ No account keeping and no payment services

3. Is your Institution or its mother company listed on any stock exchange ?

- Oui Non

The shares of SFIL (which owns 100% of CAFFIL) are not, in whole or in part, tradable on a financial market.

Nevertheless, SFIL and CAFFIL are bond issuers traded on a regulated market.

4. List of members of the supervisory board (« Conseil d'administration » of SFIL and « Conseil de Surveillance » of CAFFIL) :

SFIL			
<i>First name and last name</i>	<i>Date of birth</i>	<i>Fonction / titre</i>	<i>Politically exposed persons</i>
SORBETS Pierre	30/08/1950	Chairman of the board Board member	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
MILLS Philippe	04/11/1965	Chief Executive Officer Board Member	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
BARBOSA Sandrine	19/12/1969	Board Member	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
GUILLEMIN Frédéric	01/04/1963	Board Member	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
LATIL Cécile	07/03/1972	Board Member	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
BAYARD Serge	24/10/1963	Board Member	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
KOPP-PIRQUIN Catherine	13/04/1949	Board Member	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
DAURELLE Brigitte	01/04/1969	Board Member	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
FORST Eckhard	21/11/1959	Board Member	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
MOREAU Fabienne	22/08/1968	Board Member	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
LAURENT Pierre	19/01/1966	Board Member	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
CHAPRON Virginie	13/10/1961	Board Member	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
DE NANTES Quentin	16/10/1984	Board Member	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
DORDAIN Laëtitia	13/05/1968	Board Member	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
FABAS Olivier	29/06/1982	Board Member representing the <i>Caisse des Dépôts et Consignations</i>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

CAFFIL

<i>First name and last name</i>	<i>Date of Birth</i>	<i>Fonction / titre</i>	<i>Politically Exposed Person</i>
MILLS Philippe	04/11/1965	Chairman of the supervisory board	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
ARGOURD Nathalie	28/02/1971	Member of the supervisory board	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
CREPIN Anne	02/03/1969	Member of the supervisory board	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
GOSSEREZ Béatrice	27/11/1965	Member of the supervisory board	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
LAUGIER François	20/10/1964	Vice-chairman of the supervisory board	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
LECINQ Florent	21/10/1975	Member of the supervisory board	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

5. Directeur général / Président du Directoire :

	SFIL	CAFFIL
First name and last name	Philippe MILLS	Gilles GALLERNE
Place of birth	Paris	Rennes
Birth date	04/11/1965	25/08/1963
Nationality	French	French
Fonction	CEO	Chairman of the executive board



7. *Beneficial owner*

According to article R561-1 of the French Monetary and Financial Code, the beneficial owner of SFIL is the CEO and the beneficial owner of CAFFIL is the chairman of the Executive Board. According to article R. 561-18 I of the French Monetary and Financial Code, both are politically exposed persons.

	SFIL	CAFFIL
First name and last name	Philippe MILLS	Gilles GALLERNE
Birth date and place of birth	04/11/1965 in Paris (75)	25/08/1963 in Rennes (35)
Nationality	French	French
Function	CEO	Chairman of the executive board
Politically exposed person	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

8. *Has the Institution or any of its directors or board members been sanctioned for violations of AML/CFT Regulation ?*

Yes No

If the answer is yes, please describe the nature and date of the enforcement actions::

REGULATION, RULES AND PROCEDURES :

1. *Has your country implemented an anti-money laundering and combating the financing of terrorism legislation that complies with FATF international standards ?*

No

Yes

Please detail the references texts applicable :

Articles L.561-2 and seq. And R.561-1 and seq of the French monetary and financial Code.

2. *Has your institution set up AML/CFT procedures ?*

Yes No

If yes, date of last update : 10/2018 (review pending)

3. *Are the above-mentioned procedures applicable to all your branches and subsidiaries, both local and international ?*

Yes No

4. *Is your AML / CFT program approved by the board of directors/supervisory board or management committee of your Institution?*

Yes No

5. *Has your Institution appointed a central contact point to oversee the compliance with anti-money laundering and terrorist financing rules ?*

Yes No

If yes, please detail the following :

- Name : Béatrice GOSSEREZ
- Function : General Secretary and Head of Compliance
- Email address : beatrice.gosserez@sfil.fr

6. *Has your Institution appointed an internal auditor who regularly assesses AML/CFT procedures and practices for your Institution, your branches and your subsidiaries ?*

No

7. *Has your Institution appointed an external auditor or another third party who regularly assesses AML/CFT procedures, practices, systems and controls for your Institution, your branches and your subsidiaries?*

Yes No

8. *Does the Institution provide AML/CFT training to its employees?*

Yes No

If yes, please detail if :

- *These training programs illustrate laundering techniques specific to products and transactions offered by your Institution?*

Yes No

- *These training programs describe the internal procedures to prevent money laundering and terrorism financing?*

Oui Non

- *Your Institution keeps records of training sessions including, in particular, attendance records and training materials used ?*

Yes No

- *Your Institution has procedures that enable it to communicate to relevant employees new AML/CFT laws and changes to existing procedures and practices?*

Yes No

CLIENT DUE DILIGENCE AND KNOW YOUR CUSTOMER (KYC) POLICIES :

1. *Has your Institution implemented processes for the identification of its clients/counterparties ?*

Yes No

2. *Please mention if your KYCs policies and procedures contain the following provisions:*

- *Collect information on clients '/counterparties' activities ?*

Yes No



Au service des territoires et des exportations

- *The source of funds of your clients/counterparties ?*

Yes No

- *Review and, where appropriate, update of clients/counterparties information on a regular basis?*

Yes No

- *Review of AML/CFT procedures and practices?*

Yes No

- *An assessment of the transactions depending on the profile indentified beforehand throughout the business relationship ?*

Yes No

- *Identification of PEPs (Politically Exposed Persons)*

Yes No

- *Implementation of additional vigilance measures as provided for in article L 561-10 of the French monetary and financial Code*

Yes No

- *Records on business relationship?*

Yes No

If your answer is yes, for how long? 5 years after the end of the business relationship.

DETECTION OF SUSPICIOUS TRANSACTIONS AND REPORTING TO COMPETENT AUTHORITIES :

1. Name of the competent authority to whom suspicious transactions and activities reports are sent ?

TRACFIN (bureau of the French ministry of the Economy and Finance)

2. Does the Institution have policies for the identification and reporting of transactions that are required to be reported to the competent authorities ?

Yes No

3. Does the Institution have a monitoring program of unusual and potentially suspicious activities that covers funds transfers and monetary instruments (such as travelers checks, money orders, etc.)?

Yes Not applicable (please, detail) : SFIL is not a payment service provider.

4. *Does the Institution have procedures to ensure reasonably that it only operates with correspondent banks that possess licenses to operate in their countries of origin?*

Yes No

5. *Does the institution carry out financial operations with countries on the OFAC lists or under EU embargo?*

Yes No

6. *Does the establishment have a permanent establishment (branch, subsidiary, participation) in a jurisdiction with strategic deficiencies in its anti-money laundering and terrorist financing regime that pose a significant threat to the financial system of the Union (“high-risk third countries”) or with strategic AML / CFT deficiencies according to the FATF ?*

Yes No

7. *Does the Institution have implemented a system to detect entities or individuals listed on the following lists ?*

French official embargoes lists

European official lists

OFAC Lists

Other (please detail) : All Dow Jones Factiva lists'

Name : **GOSSEREZ Béatrice**
General Secretary
Head of Compliance Department
Date : November 24th 2020
Signature :

