

Wolfsberg Questionnaire 2023 (Annex)



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| Financial Institution Name: | SFIL |
| Location (Country) : | France |

| No # | Question | Answer |
|-----------------------------------|---|---|
| 1. ENTITY & OWNERSHIP | | |
| 1. | Name of primary financial regulator/supervisory | ACPR Autorité de contrôle prudentiel et de résolution |
| 2. | Provide the full legal name of the ultimate parent | La Caisse des depôts et consignations |
| 3. | Jurisdiction of licensing authority and regulator of ultimate parent | ACPR Autorité de contrôle prudentiel et de résolution |
| 4. | Select the business areas applicable to the Entity | |
| 5 a | Retail Banking | No |
| 5 b | Private Banking | No |
| 5 c | Commercial Banking | No |
| 5 d | Transactional Banking | Yes |
| 5 e | Investment Banking | Yes |
| 5 f | Financial Markets Trading | Yes |
| 5 g | Securities Services/Custody | No |
| 5 h | Broker/Dealer | Yes |
| 5 i | Multilateral Development Bank | No |
| 5 j | Wealth Management | Yes |
| 2. PRODUCTS & SERVICES | | |
| 6. | Does the Entity offer the following products and services ? | |
| 6.a | Correspondent Banking | No |
| 7 | Does the Entity allow downstream relationships | |
| 7.a | MSBs | No |
| 7.b | MVTs | No |
| 7.c | PSPs | No |
| 8 | Does the Entity have processes and procedures in place to identify downstream relationships with MSBs /MVTs/PSPs? | |
| 8.a | Cross-Border Bulk Cash Delivery | No |
| 8.b | Cross-Border Remittances | No |
| 8.c | Domestic Bulk Cash Delivery | No |
| 8.d | Hold Mail | No |
| 8.e | International Cash Letter | No |
| 8.f | Low Price Securities | No |
| 8.g | Payable Through Accounts | No |
| 9 | Payment services to non-bank entities who may then offer third party payment services to their customers? | No |
| 3. AML, CTF & SANCTIONS PROGRAMME | | |
| 11 | Does the entity have a whistleblower policy? | Yes |

| 4. ANTI BRIBERY & CORRUPTION | | |
|---|--|------------------|
| 12 | Does the Entity have a global ABC policy that: | |
| 12.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. | Yes |
| 12.b | Includes enhanced requirements regarding interaction with public officials? | Yes |
| 12.c | 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 |
| 13 | Does the Entity have controls in place to monitor the effectiveness of their ABC programme? | Yes |
| 14 | Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme? | Yes |
| 5. AML, CTF & SANCTIONS POLICIES & PROCEDURES | | |
| 15 | Are the Entity's policies and procedures updated at least annually? | Yes |
| 16 | Has the Entity chosen to compare its policies and procedures against EU Standards? | Yes |
| 6. AML, CTF & SANCTIONS RISK ASSESSMENT | | |
| 17 | Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: | |
| 17.a | Client | Yes |
| 17.b | Product | Yes |
| 17.c | Channel | Yes |
| 17.d | Geography | Yes |
| 17.e | Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: | |
| 17.f | Transaction Monitoring | Yes |
| 17.g | Customer Due Diligence | Yes |
| 17.h | PEP Identification | Yes |
| 17.i | Name Screening against Adverse Media/Negative News | Yes |
| 17.j | Training and Education | Yes |
| 17.k | Governance | Yes |
| 17.l | Management Information | Yes |
| 7. SANCTIONS | | |
| 18 | Does the Entity have policies, procedures, or other controls reasonably designed to prevent the use another entity's accounts or services in a manner causing the other entity to violate sanctions prohibitions applicable to the other entity (including prohibitions within the other entity's local jurisdiction ? | Yes |
| 19 | What is the method used by the Entity for sanctions screening? | Automated |
| 20 | If 'automated' or 'both automated and manual' selected: | |
| 20.a | Are internal system of vendor-sourced tools use | Yes |
| 20.b | If a 'vendor-sourced tool' or 'both' selected, why is the name of the vendor/tool? | DowJones Factiva |

| 8. TRAINING EDUCATION | | |
|-----------------------|---|---------|
| 21 | Does the Entity provide AML, CTF & Sanctions training that is targeted to specific roles, responsibilities and high-risk products, services and activities? | Yes |
| 22 | Does the Entity provide customised training for AML, CTF and Sanctions staff? | Yes |
| 23 | If Y, how frequently is training delivered? | 2 Years |
| 9. AUDIT | | |
| 24 | Does the internal audit function or other independent third party cover the following areas: | |
| 24.a | AML, CTF, ABC, Fraud and Sanctions policy and procedures | Yes |
| 24.b | Governance | Yes |
| 24.c | KYC/CDD/EDD and underlying methodologies | Yes |
| 24.d | Name Screening & List Management | Yes |
| 24.e | Transaction Monitoring | Yes |
| 24.f | Transaction Screening including for sanctions | Yes |
| 24.g | Training & Education | Yes |
| 25 | Are adverse findings from internal & external audit | Yes |

Signature Page

Wolfsberg Group Questionnaire annex

SFIL

(Financial Institution name)

BEATRICE GOSSEREZ

I, (Senior Compliance Manager- Second Line representative),
certify that I have read and understood this declaration, that the answers provided in this Wolfsberg FCCQ are
complete and correct to my honest belief.

October 11, 2023

Béatrice Gosserez

(Signature & Date)