

Wolfsberg Questionnaire 2023 (Annex)



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 dépôts 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	No
5 i	Multilateral Development Bank	No
5 j	Wealth Management	No
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	MVTSSs	No
7.c	PSPs	No
8	Does the Entity have processes and procedures in place to identify downstream relationships with MSBs /MVTSSs/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		

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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		

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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)

CECILE DEGOVE General Secrétaire- Head of Compliance & Legal

I, _____ (

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.

March 14, 2025

Cécile Degove

(Signature & Date)