

**the  
Wolfsberg  
Group**

Financial Institution Name:

SOCIETE GENERALE

Location (Country) :

France

No #	Question	Answer
<b>1. ENTITY &amp; OWNERSHIP</b>		
1	Full Legal name	SOCIETE GENERALE
2	Append a list of foreign branches which are covered by this questionnaire (if applicable)	Please refer to the list of branches in appendix
3	Full Legal (Registered) Address	29 Boulevard Haussmann 75009 Paris - France
4	Full Primary Business Address (if different from above)	17 cours Valmy 92972 Paris-La Défense - France
5	Date of Entity incorporation / establishment	May 4, 1864
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	Bourse de Paris - Euronext Paris - GLE
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) ?	Yes
8 a	If Y, provide the name of the relevant branch/es which operate under an OBL	SOCIETE GENERALE, GRAND CAYMAN BRANCH

2. AML, CTF & SANCTIONS PROGRAMME		
9	Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:	
9 a	Appointed Officer with sufficient experience / expertise	Yes
9 b	Cash Reporting	Yes
9 c	CDD	Yes
9 d	EDD	Yes
9 e	Beneficial Ownership	Yes
9 f	Independent Testing	Yes
9 g	Periodic Review	Yes
9 h	Policies and Procedures	Yes
9 i	Risk Assessment	Yes
9 j	Sanctions	Yes
9 k	PEP Screening	Yes
9 l	Adverse Information Screening	Yes
9 m	Suspicious Activity Reporting	Yes
9 n	Training and Education	Yes
9 o	Transaction Monitoring	Yes
10	Is the Entity's AML, CTF & Sanctions policy approved at least annually by the Board or equivalent Senior Management Committee?	Yes
11	Does the Entity use third parties to carry out any components of its AML, CTF & Sanctions programme?	Yes
11a	If Y, provide further details	We use third parties located in India and Romania to carry out some of our AML-CTF-Sanctions functions but these providers are an integral part of SG Group. We may also use external providers to manage KYC documentation collection, verification and scanning - but KYC files are systematically validated within SG Group.

### 3. ANTI BRIBERY & CORRUPTION

12	Has the Entity documented policies and procedures consistent with applicable ABC regulations and requirements to [reasonably] prevent, detect and report bribery and corruption?	Yes
13	Does the Entity's internal audit function or other independent third party cover ABC Policies and Procedures?	Yes
14	Does the Entity provide mandatory ABC training to:	
14 a	Board and Senior Committee Management	Yes
14 b	1st Line of Defence	Yes
14 c	2nd Line of Defence	Yes
14 d	3rd Line of Defence	Yes
14 e	3rd parties to which specific compliance activities subject to ABC risk have been outsourced	Yes
14 f	Non-employed workers as appropriate (contractors / consultants)	Yes

**4. AML, CTF & SANCTIONS POLICIES & PROCEDURES**

<b>15</b>	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report:	
<b>15 a</b>	Money laundering	Yes
<b>15 b</b>	Terrorist financing	Yes
<b>15 c</b>	Sanctions violations	Yes
<b>16</b>	Does the Entity have policies and procedures that:	
<b>16 a</b>	Prohibit the opening and keeping of anonymous and fictitious named accounts	Yes
<b>16 b</b>	Prohibit the opening and keeping of accounts for unlicensed banks and / or NBFIs	Yes
<b>16 c</b>	Prohibit dealing with other entities that provide banking services to unlicensed banks	Yes
<b>16 d</b>	Prohibit accounts / relationships with shell banks	Yes
<b>16 e</b>	Prohibit dealing with another Entity that provides services to shell banks	Yes
<b>16 f</b>	Prohibit opening and keeping of accounts for Section 311 designated entities	Yes
<b>16 g</b>	Prohibit opening and keeping of accounts for any of unlicensed / unregulated remittance agents, exchanges houses, casa de cambio, bureaux de change or money transfer agents	Yes
<b>16 h</b>	Assess the risks of relationships with domestic and foreign PEPs, including their family and close associates	Yes
<b>16 i</b>	Define escalation processes for financial crime risk issues	Yes
<b>16 j</b>	Specify how potentially suspicious activity identified by employees is to be escalated and investigated	Yes
<b>16 k</b>	Outline the processes regarding screening for sanctions, PEPs and negative media	Yes
<b>17</b>	Has the Entity defined a risk tolerance statement or similar document which defines a risk boundary around their business?	Yes
<b>18</b>	Does the Entity have a record retention procedures that comply with applicable laws?	Yes
<b>18 a</b>	If Y, what is the retention period?	5 years or more

**Wolfsberg Group Financial Crime Compliance Questionnaire (FCCQ) v1.1**

5. KYC, CDD and EDD		
19	Does the Entity verify the identity of the customer?	Yes
20	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
21	Which of the following does the Entity gather and retain when conducting CDD? Select all that apply:	
21 a	Ownership structure	Yes
21 b	Customer identification	Yes
21 c	Expected activity	Yes
21 d	Nature of business / employment	Yes
21 e	Product usage	Yes
21 f	Purpose and nature of relationship	Yes
21 g	Source of funds	Yes
21 h	Source of wealth	Yes
22	Are each of the following identified:	
22 a	Ultimate beneficial ownership	Yes
22 a1	Are ultimate beneficial owners verified?	Yes
22 b	Authorised signatories (where applicable)	Yes
22 c	Key controllers	Yes
22 d	Other relevant parties	Other relevant parties are identified as per the Bank assessment on a risk based approach.
23	Does the due diligence process result in customers receiving a risk classification?	Yes
24	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
25	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
26	Does the Entity have a process to review and update customer information based on:	
26 a	KYC renewal	Yes
26 b	Trigger event	Yes

**Wolfsberg Group Financial Crime Compliance Questionnaire (FCCQ) v1.1**

<b>27</b>	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?	
<b>27 a</b>	Non-account customers	Do not have this category of customer or industry
<b>27 b</b>	Non-resident customers	EDD on a risk based approach
<b>27 c</b>	Shell banks	Prohibited
<b>27 d</b>	MVTS/ MSB customers	EDD on a risk based approach
<b>27 e</b>	PEPs	EDD on a risk based approach
<b>27 f</b>	PEP Related	EDD on a risk based approach
<b>27 g</b>	PEP Close Associate	EDD on a risk based approach
<b>27 h</b>	Correspondent Banks	EDD on a risk based approach
<b>27 h1</b>	If EDD or EDD & restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2014?	Yes
<b>27 i</b>	Arms, defense, military	EDD & restricted on a risk based approach
<b>27 j</b>	Atomic power	EDD & restricted on a risk based approach
<b>27 k</b>	Extractive industries	EDD & restricted on a risk based approach
<b>27 l</b>	Precious metals and stones	EDD & restricted on a risk based approach
<b>27 m</b>	Unregulated charities	EDD on a risk based approach
<b>27 n</b>	Regulated charities	EDD on a risk based approach
<b>27 o</b>	Red light business / Adult entertainment	EDD on a risk based approach
<b>27 p</b>	Non-Government Organisations	EDD on a risk based approach
<b>27 q</b>	Virtual currencies	EDD on a risk based approach
<b>27 r</b>	Marijuana	Prohibited
<b>27 s</b>	Embassies / Consulates	EDD on a risk based approach
<b>27 t</b>	Gambling	EDD on a risk based approach
<b>27 u</b>	Payment Service Provider	EDD on a risk based approach
<b>27 v</b>	Other (specify)	<a href="https://www.societegenerale.com/en/responsability/csr-ambition/csr-commitments">https://www.societegenerale.com/en/responsability/csr-ambition/csr-commitments</a> <a href="https://www.societegenerale.com/sites/default/files/documents/2021-03/Environmental-and-Social-General-Principles.pdf">https://www.societegenerale.com/sites/default/files/documents/2021-03/Environmental-and-Social-General-Principles.pdf</a>
<b>28</b>	If restricted, provide details of the restriction	Q70r : Exclusion of the companies that are mainly dedicated to Marijuana <a href="https://www.societegenerale.com/en/responsability/ethics-and-governance">https://www.societegenerale.com/en/responsability/ethics-and-governance</a>

6. MONITORING & REPORTING		
29	Does the Entity have risk based policies, procedures and monitoring processes for the identification and reporting of suspicious activity?	Yes
30	What is the method used by the Entity to monitor transactions for suspicious activities?	Combination of automated and manual
31	Does the Entity have regulatory requirements to report suspicious transactions?	Yes
31 a	If Y, does the Entity have policies, procedures and processes to comply with suspicious transactions reporting requirements?	Yes
32	Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity?	Yes

7. PAYMENT TRANSPARENCY		
33	Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards?	Yes
34	Does the Entity have policies, procedures and processes to [reasonably] comply with and have controls in place to ensure compliance with:	
34 a	FATF Recommendation 16	Yes
34 b	Local Regulations	Yes
34 b1	Specify the regulation	Such as: EU regulation 2015-847. US (Travel Rules), Japan, Switzerland, Turkey, Korea, India, Singapore (MAS Guidance) and Taiwan regulations.
34 c	If N, explain	



8. SANCTIONS		
35	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?	Yes
36	Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists?	Yes
37	Select the Sanctions Lists used by the Entity in its sanctions screening processes:	
37 a	Consolidated United Nations Security Council Sanctions List (UN)	Used for screening customers and beneficial owners and for filtering transactional data
37 b	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
37 c	Office of Financial Sanctions Implementation HMT (OFSI)	Used for screening customers and beneficial owners and for filtering transactional data
37 d	European Union Consolidated List (EU)	Used for screening customers and beneficial owners and for filtering transactional data
37 e	Lists maintained by other G7 member countries	Used for screening customers and beneficial owners and for filtering transactional data
37 f	Other (specify)	Any other local list as it may be required by relevant local regulations, such as: Belgium, Canada, Hong Kong, Japan, Netherlands, South Korea, Switzerland, UAE, UK
38	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

## 9. TRAINING & EDUCATION

39	Does the Entity provide mandatory training, which includes :	
39 a	Identification and reporting of transactions to government authorities	Yes
39 b	Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered	Yes
39 c	Internal policies for controlling money laundering, terrorist financing and sanctions violations	Yes
39 d	New issues that occur in the market, e.g., significant regulatory actions or new regulations	Yes
40	Is the above mandatory training provided to :	
40 a	Board and Senior Committee Management	Yes
40 b	1st Line of Defence	Yes
40 c	2nd Line of Defence	Yes
40 d	3rd Line of Defence	Yes
40 e	3rd parties to which specific FCC activities have been outsourced	Yes
40 f	Non-employed workers (contractors / consultants)	Yes

**10. AUDIT**

41	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
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Wolfsberg Group Financial Crime Compliance Questionnaire 2020 (FCCQ V1.1)

SOCIETE GENERALE

(Financial Institution name)

Grégoire SIMON BARBOUX

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.

21/4/2022

(Signature & Date)



Country	Town / Location	Name	Branch Address	Local Regulator	date of incorporation/ establishment
AUSTRALIA	SYDNEY	SOCIETE GENERALE	1-7 Bligh Street Sydney NSW 2000 AUSTRALIA	Australian Prudential Regulation Authority (APRA)	16/05/2019
AUSTRIA	VIENNA	SOCIETE GENERALE	Prinz-Eugen-Strasse 8-10/5/11 - A 1040 VIENNA AUSTRIA	Austrian Financial Market Authority (Österreichische Finanzmarktaufsicht - FMA)	21/08/1998
BELGIUM	BRUXELLES	SOCIETE GENERALE	Atrium Building, Rue des Colonies 11, 4th Floor, 1000 BRUXELLES BELGIUM	Financial Services and Market Authority (FSMA)	31/12/1995
CANADA	MONTREAL	SOCIETE GENERALE	1501 McGill College Suite 1800 H3A 3M8 - Montréal QUEBEC CANADA	Office of the Superintendent of Financial Institutions (OSFI)	19/12/2005
CAYMAN ISLANDS	GRAND CAYMAN	SOCIETE GENERALE	c/o Calinvest Bank and Trust Limited Harbour Place, 5th Floor, 103 South Church Street, KY1 1108 George Town, CAYMAN ISLANDS (P.O. Box 1353GT, Grand Cayman, KY1-1108)	Cayman Islands Monetary Authority (CIMA)	01/01/1979
GERMANY	FRANKFURT	SOCIETE GENERALE	Neue Mainzer Strasse 46-50, 60311 FRANKFURT AM MAIN GERMANY	Federal Financial Supervisory Authority (Bundesanstalt für Finanzdienstleistungsaufsicht - BaFin)	01/09/1977
HONG KONG	HONG KONG	SOCIETE GENERALE	Level 38, Three Pacific Place, 1 Queen's Road East, HONG KONG	Hong Kong Monetary Authority SFC - Securities & Futures Commission	25/07/1978
INDIA	MUMBAI	SOCIETE GENERALE	Peninsula Business park, 18th floor, tower A, Ganpat Rao Kadam Marg, Lower Parel, MUMBAI 400013 INDIA	Reserve Bank of India	15/04/1985
IRELAND	DUBLIN	SOCIETE GENERALE	3 <sup>rd</sup> floor, IFSC House International Financial Services Center DUBLIN 1 IRELAND	Central Bank of Ireland	05/11/1999
ITALY	MILAN	SOCIETE GENERALE	Via Olona, 2 20123 MILANO ITALY	Banca D'Italia - Bank of Italy	31/12/1980
JAPAN	TOKYO	SOCIETE GENERALE	Palace Building, 1-1-1 Marunouchi, Chiyoda-ku, TOKYO 100-8206 JAPAN	Financial Services Agency (FSA)	11/06/1973
MONACO	MONACO	SOCIETE GENERALE	16 Avenue de la Costa Palais de la Scala -BP 249 MC 98007 MONACO CEDEX	Autorité de Contrôle Prudentiel et de Résolution (ACPR - France)	28/06/1962
NETHERLANDS	AMSTERDAM	SOCIETE GENERALE	Amstelveen 1 « Rembrandt Tower » 1096 HA AMSTERDAM NETHERLANDS	De Nederlandsche Bank - Dutch Central Bank (DNB) Netherlands Authority for the Financial Markets (AFM)	11/07/1977
POLAND	WARSAW	SOCIETE GENERALE	Oddział w Polsce ul. Marszałkowska 111 00-102 Warsaw POLAND	Komisja Nadzoru Finansowego - Polish Financial Supervision Authority	01/01/1992
SINGAPORE	SINGAPORE	SOCIETE GENERALE	8 Marina Boulevard #12-01 Marina Bay Financial Centre Tower 1 SINGAPORE 018981	Monetary Authority of Singapore (MAS)	28/12/1978
SOUTH AFRICA	JOHANNESBURG	SOCIETE GENERALE	2ND FLOOR 160 Jan Smuts Avenue, Rosebank 2196 - PO Box 6872 JOHANNESBURG 2000 SOUTH AFRICA	South African Reserve Bank (SARB)	21/05/1996
SOUTH KOREA	SEOUL	SOCIETE GENERALE	23rd Floor, D1 D-Tower, 17 Jong-ro 3-gil, Jongno-gu, 03155 SEOUL, SOUTH KOREA	Financial Supervisory Service	01/12/1983
SPAIN	MADRID	SOCIETE GENERALE	Torre Picasso, 1 Plaza Pablo Ruiz Picasso 28020 MADRID SPAIN	Banco de España - Bank of Spain	31/05/1991
SWEDEN	STOCKHOLM	SOCIETE GENERALE	7 Nybrogatan, 8th floor SE 111 46 Stockholm, SWEDEN	Finansinspektionen (FI)	15/11/2017
SWITZERLAND	ZURICH	SOCIETE GENERALE	Talacker 50, Case Postale 1928, CH-8021, ZURICH SWITZERLAND	Swiss Financial Market Supervisory Authority (FINMA)	01/07/1999
TAIWAN	TAIPEI	SOCIETE GENERALE	Taiwan 38F, No. 68, Section 5, Zhongxiao East Road, Xinyi District, Taipei City 110, TAIWAN	Financial Supervisory Commission and Central Bank of the Republic of China (Taiwan)	25/09/1980
TURKEY	ISTANBUL	SOCIETE GENERALE	Nispetiye Caddesi Akmerkez E-3 Blok Kat 10 80500 ISTANBUL TURKEY	Bankacılık Düzenleme ve Denetleme Kurumu (Banking Regulation and Supervision Agency - BRSA) Central Bank of the Republic of Turkey Capital Market Board	01/06/1990
UNITED ARAB EMIRATES	Dubai International Financial Center (DIFC)	SOCIETE GENERALE	Societe Generale DIFC Branch (Middle East) Dubai International Financial Center (DIFC), The Gate Village, Building 6, Dubai, UAE PO Box 29600	Dubai Financial Services Authority (DFSA)	02/07/2007
UNITED KINGDOM	LONDON	SOCIETE GENERALE	One Bank Street, Canary Wharf London, E14 4SG UK	Financial Conduct Authority (FCA)	01/01/1871
UNITED STATES	NEW YORK	SOCIETE GENERALE	245 Park Avenue NEW YORK, NY 10167 USA	New York State Department of Financial Services (NYS) Federal Reserve	01/12/1982
	CHICAGO	SOCIETE GENERALE	425 S Financial Place, Chicago, IL 60605 USA	New York State Department of Financial Services (NYS) Federal Reserve	28/10/1981