

**6. MONITORING & REPORTING**

<b>29</b>	Does the Entity have risk based policies, procedures and monitoring processes for the identification and reporting of suspicious activity?	Yes
<b>30</b>	What is the method used by the Entity to monitor transactions for suspicious activities?	Combination of automated and manual
<b>31</b>	Does the Entity have regulatory requirements to report suspicious transactions?	Yes
<b>31 a</b>	If Y, does the Entity have policies, procedures and processes to comply with suspicious transactions reporting requirements?	Yes
<b>32</b>	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	Regulation (EU) 2015/847 of the European Parliament and of the Council of May 2016 on information accompanying transfers of funds and repealing Regulation (EC) N°1781/2006.
34 c	If N, explain	

**8. SANCTIONS**

<b>35</b>	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
<b>36</b>	Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists?	Yes
<b>37</b>	Select the Sanctions Lists used by the Entity in its sanctions screening processes:	
<b>37 a</b>	Consolidated United Nations Security Council Sanctions List (UN)	Used for screening customers and beneficial owners and for filtering transactional data
<b>37 b</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
<b>37 c</b>	Office of Financial Sanctions Implementation HMT (OFSI)	Used for screening customers and beneficial owners and for filtering transactional data
<b>37 d</b>	European Union Consolidated List (EU)	Used for screening customers and beneficial owners and for filtering transactional data
<b>37 e</b>	Lists maintained by other G7 member countries	Used for screening customers and beneficial owners and for filtering transactional data
<b>37 f</b>	Other (specify)	#37 - UN, EU, OFAC and French sanctions lists are used group wide. Other lists (HMT OFSI and other G7 countries) are applicable locally.
<b>38</b>	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		
<b>39</b>	Does the Entity provide mandatory training, which includes :	
<b>39 a</b>	Identification and reporting of transactions to government authorities	Yes
<b>39 b</b>	Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered	Yes
<b>39 c</b>	Internal policies for controlling money laundering, terrorist financing and sanctions violations	Yes
<b>39 d</b>	New issues that occur in the market, e.g., significant regulatory actions or new regulations	Yes
<b>40</b>	Is the above mandatory training provided to :	
<b>40 a</b>	Board and Senior Committee Management	Yes
<b>40 b</b>	1st Line of Defence	Yes
<b>40 c</b>	2nd Line of Defence	Yes
<b>40 d</b>	3rd Line of Defence	Yes
<b>40 e</b>	3rd parties to which specific FCC activities have been outsourced	Not Applicable
<b>40 f</b>	Non-employed workers (contractors / consultants)	Yes

**10. AUDIT**


<b>41</b>	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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**Signature Page**

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

BNP PARIBAS SA

Anne-Catherine COLLEAU

I,  Head of Group Financial Security, 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.

13/03/2023



(Signature & Date)