

the Wolfsberg Group

Financial Institution Name:
Location (Country):

SFIL
France

No #	Question	Answer
1. ENTITY & OWNERSHIP		
1	Full Legal name	SFIL This Questionnaire also applies to SFIL's sole subsidiary (Caisse française de financement local - CAFFIL which is registered in France)
2	Append a list of foreign branches which are covered by this questionnaire	SFIL has no foreign branches
3	Full Legal (Registered) Address	112-114 Avenue Emile Zola 75015 Paris
4	Full Primary Business Address (if different from above)	
5	Date of Entity incorporation/establishment	10 May 2007
6	Select type of ownership and append an ownership chart if available	
6 a	Publicly Traded (25% of shares publicly traded)	No
6 a1	If Y, indicate the exchange traded on and ticker symbol	
6 b	Member Owned/Mutual	No
6 c	Government or State Owned by 25% or more	Yes
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) ?	No
8 a	If Y, provide the name of the relevant branch/es which operate under an OBL	
9	Does the Bank have a Virtual Bank License or provide services only through online channels?	No
10	Provide Legal Entity Identifier (LEI) if available	
2. AML, CTF & SANCTIONS PROGRAMME		
11	Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:	
11 a	Appointed Officer with sufficient experience/expertise	Yes
11 b	Adverse Information Screening	Yes
11 c	Beneficial Ownership	Yes
11 d	Cash Reporting	Not Applicable
11 e	CDD	Yes
11 f	EDD	Yes

11 g	Independent Testing	Yes
11 h	Periodic Review	Yes
11 i	Policies and Procedures	Yes
11 j	PEP Screening	Yes
11 k	Risk Assessment	Yes
11 l	Sanctions	Yes
11 m	Suspicious Activity Reporting	Yes
11 n	Training and Education	Yes
11 o	Transaction Monitoring	Yes
12	Is the Entity's AML, CTF & Sanctions policy approved at least annually by the Board or equivalent Senior Management Committee?	No
13	Does the Entity use third parties to carry out any components of its AML, CTF & Sanctions programme?	Yes
13 a	If Y, provide further details	In the framework of its export credit activity, SFIL may use its "banking partner" as third parties to provide it with KYC information
14	Does the entity have a whistleblower policy?	Yes
3. ANTI BRIBERY & CORRUPTION		
15	Has the Entity documented policies and procedures consistent with applicable ABC regulations and requirements to reasonably prevent, detect and report bribery and corruption?	Yes
16	Does the Entity's internal audit function or other independent third party cover ABC Policies and Procedures?	Yes
17	Does the Entity provide mandatory ABC training to:	
17 a	Board and Senior Committee Management	Yes
17 b	1st Line of Defence	Yes
17 c	2nd Line of Defence	Yes
17 d	3rd Line of Defence	Yes
17 e	Third parties to which specific compliance activities subject to ABC risk have been outsourced	Not applicable
17 f	Non-employed workers as appropriate (contractors/consultants)	No
4. AML, CTF & SANCTIONS POLICIES & PROCEDURES		
18	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report:	
18 a	Money laundering	Yes
18 b	Terrorist financing	Yes
18 c	Sanctions violations	Yes
19	Does the Entity have policies and procedures that:	
19 a	Prohibit the opening and keeping of anonymous and fictitious named accounts	No
19 b	Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs	No
19 c	Prohibit dealing with other entities that provide banking services to unlicensed banks	Yes
19 d	Prohibit accounts/relationships with shell banks	Yes
19 e	Prohibit dealing with another Entity that provides services to shell banks	Yes
19 f	Prohibit opening and keeping of accounts for Section 311 designated entities	No
19 g	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	No
19 h	Assess the risks of relationships with domestic and foreign PEPs, including their family and close associates	Yes
19 i	Define the process for escalating financial crime risk issues/potentially suspicious activity identified by employees	Yes
19 j	Outline the processes regarding screening for sanctions, PEPs and Adverse Media/Negative News	Yes

20	Has the Entity defined a risk tolerance statement or similar document which defines a risk boundary around their business?	Yes
21	Does the Entity have record retention procedures that comply with applicable laws?	Yes
21 a	If Y, what is the retention period?	5 years or more
5. KYC, CDD and EDD		
22	Does the Entity verify the identity of the customer?	Yes
23	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
24	Which of the following does the Entity gather and retain when conducting CDD? Select all that apply:	
24 a	Customer identification	Yes
24 b	Expected activity	Yes
24 c	Nature of business/employment	Yes
24 d	Ownership structure	Yes
24 e	Product usage	Yes
24 f	Purpose and nature of relationship	Yes
24 g	Source of funds	Yes
24 h	Source of wealth	Yes
25	Are each of the following identified:	
25 a	Ultimate beneficial ownership	Yes
25 a1	Are ultimate beneficial owners verified?	Yes
25 b	Authorised signatories (where applicable)	Yes
25 c	Key controllers	Yes
25 d	Other relevant parties	Yes
26	Does the due diligence process result in customers receiving a risk classification?	Yes
27	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
28	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
29	Is KYC renewed at defined frequencies based on risk rating (Periodic Reviews)?	Yes
29 a	If yes, select all that apply:	
29 a1	Less than one year	Yes
29 a2	1 – 2 years	No
29 a3	3 – 4 years	No
29 a4	5 years or more	No
29 a5	Trigger-based or perpetual monitoring reviews	Yes
29 a6	Other (please specify)	
30	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?	
30 a	Arms, Defence, Military	EDD on risk-based approach
30 b	Respondent Banks	Do not have this category of customer or industry
30 b1	If EDD or EDD & restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022?	Please select
30 c	Embassies/Consulates	Do not have this category of customer or industry
30 d	Extractive industries	EDD on risk-based approach
30 e	Gambling customers	Prohibited
30 f	General Trading Companies	Please select
30 g	Marijuana-related Entities	Prohibited
30 h	MSB/MVTS customers	Do not have this category of customer or industry
30 i	Non-account customers	Do not have this category of customer or industry
30 j	Non-Government Organisations	EDD on risk-based approach
30 k	Non-resident customers	EDD on risk-based approach

30 l	Nuclear power	EDD on risk-based approach
30 m	Payment Service Providers	EDD on risk-based approach
30 n	PEPs	Do not have this category of customer or industry
30 o	PEP Close Associates	Do not have this category of customer or industry
30 p	PEP Related	Do not have this category of customer or industry
30 q	Precious metals and stones	Prohibited
30 r	Red light businesses/Adult entertainment	Prohibited
30 s	Regulated charities	EDD on risk-based approach
30 t	Shell banks	Do not have this category of customer or industry
30 u	Travel and Tour Companies	EDD on risk-based approach
30 v	Unregulated charities	EDD on risk-based approach
30 w	Used Car Dealers	Do not have this category of customer or industry
30 x	Virtual Asset Service Providers	Do not have this category of customer or industry
30 y	Other (specify)	
31	If restricted, provide details of the restriction	Restrictions are applied on a case by case basis, in respect of AML/CFT, sanctions and embargos law and regulations and SFIL's risk classification
6. MONITORING & REPORTING		
32	Does the Entity have risk based policies, procedures and monitoring processes for the identification and reporting of suspicious activity?	Yes
33	What is the method used by the Entity to monitor transactions for suspicious activities?	Manual
33 a	If manual or combination selected, specify what type of transactions are monitored manually	
34	Does the Entity have regulatory requirements to report suspicious transactions?	Yes
34 a	If Y, does the Entity have policies, procedures and processes to comply with suspicious transactions reporting requirements?	Yes
35	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		
36	Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards?	No
37	Does the Entity have policies, procedures and processes to comply with and have controls in place to ensure compliance with:	
37 a	FATF Recommendation 16	No
37 b	Local Regulations	No
37 b1	If Y, Specify the regulation	
37 c	If N, explain	SFIL is not a service payment provider and provides no services to correspondent banks but uses the services of correspondent banks for its banking activities.
8. SANCTIONS		
38	Does the Entity have a Sanctions Policy approved by management regarding compliance with sanctions law applicable to the Entity, including with respect to its business conducted with, or through accounts held at foreign financial institutions?	Yes
39	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

40	Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists?	Yes
41	Select the Sanctions Lists used by the Entity in its sanctions screening processes:	
41 a	Consolidated United Nations Security Council Sanctions List (UN)	Used for screening customers and beneficial owners and for filtering trans
41 b	United States Department of the Treasury's Office of Foreign Assets Control (OFAC)	Used for screening customers and beneficial owners and for filtering trans
41 c	Office of Financial Sanctions Implementation HMT (OFSI)	Used for screening customers and beneficial owners and for filtering trans
41 d	European Union Consolidated List (EU)	Used for screening customers and beneficial owners and for filtering trans
41 e	Lists maintained by other G7 member countries	Used for screening customers and beneficial owners and for filtering trans
41 f	Other (specify)	SFIL uses all lists supplied by Dow Jones FACTIVA for screening customers, beneficial owners, Legal Representative and shareholders.
42	Does the Entity have a physical presence, e.g. branches, subsidiaries, or representative offices located in countries/regions against which UN, OFAC, OFSI, EU or G7 member countries have enacted comprehensive jurisdiction-based Sanctions?	No
9. TRAINING & EDUCATION		
43	Does the Entity provide mandatory training, which includes:	
43 a	Identification and reporting of transactions to government authorities	Yes
43 b	Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered	Yes
43 c	Internal policies for controlling money laundering, terrorist financing and sanctions violations	Yes
43 d	New issues that occur in the market, e.g. significant regulatory actions or new regulations	Yes
44	Is the above mandatory training provided to :	
44 a	Board and Senior Committee Management	Yes
44 b	1st Line of Defence	Yes
44 c	2nd Line of Defence	Yes
44 d	3rd Line of Defence	Yes
44 e	Third parties to which specific FCC activities have been outsourced	Not Applicable
44 f	Non-employed workers (contractors/consultants)	No
10. AUDIT		
45	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, ABC, Fraud and Sanctions policies and practices on a regular basis?	Yes
Signature Page		
Wolfsberg Group Financial Crime Compliance Questionnaire 2023 (FCCQ V1.2)		
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		
<i>Beatrice Gosserez</i> _____ (Signature & Date)		

Wolfsberg Questionnaire 2023 (Annex)

the Wolfsberg Group

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	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	MVTSS	No
7.c	PSPs	No
8	Does the Entity have processes and procedures in place to identify downstream relationships with MSBs /MVTSS/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

Béatrice Gosserez

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)

I, BEATRICE GOSSEREZ (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
Beatrice Gosserez (Signature & Date)