



Financial Institution Name:

Crédit Agricole Corporate and Investment Bank

Location (Country) :

France

The questionnaire is required to be answered on a Legal Entity (LE) Level. This means the Financial Institution will answer the questionnaire at an ultimate parent / head office & subsidiary level for which any branches would be considered covered by that parent/subsidiary DDQ. This questionnaire should not cover more than one LE. Each question in the DDQ will need to be addressed from the perspective of the LE and on behalf of all of its branches. If a response for the LE differed for one of its branches this needs to be highlighted and detail regarding this difference captured at the end of each subsection. If a branch business activity (products offered, client base etc.) is significantly different than its head office, the branch should complete a separate questionnaire.

No #	Question	Answer
<b>1. ENTITY &amp; OWNERSHIP</b>		
1	Full Legal Name	Crédit Agricole Corporate and Investment Bank
2	Append a list of branches which are covered by this questionnaire	
3	Full Legal (Registered) Address	12, Place des Etats-Unis CR 70052 92547 Montrouge CEDEX, France
4	Full Primary Business Address (if different from above)	
5	Date of Entity incorporation/ establishment	26 November 1973
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	No
6 d	Privately Owned	Yes
6 d1	If Y, provide details of shareholders or ultimate beneficial owners with a holding of 10% or more	Crédit Agricole SA
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
a	If Y, provide the name of the relevant branch/es which operate under an OBL	Crédit Agricole Corporate and Investment Bank DIFC
9	Name of primary financial regulator / supervisory authority	Autorité de Contrôle Prudentiel et de Résolution
10	Provide Legal Entity Identifier (LEI) if available	1VUV7VQFKUOQSJ21A208

<b>11</b>	Provide the full legal name of the ultimate parent (if different from the Entity completing the DDQ)	SAS RUE LA BOETIE
<b>12</b>	Jurisdiction of licensing authority and regulator of ultimate parent	France
<b>13</b>	Select the business areas applicable to the Entity	
<b>13 a</b>	Retail Banking	No
<b>13 b</b>	Private Banking / Wealth Management	No
<b>13 c</b>	Commercial Banking	Yes
<b>13 d</b>	Transactional Banking	Yes
<b>13 e</b>	Investment Banking	Yes
<b>13 f</b>	Financial Markets Trading	Yes
<b>13 g</b>	Securities Services / Custody	No
<b>13 h</b>	Broker / Dealer	Yes
<b>13 i</b>	Multilateral Development Bank	No
<b>13 j</b>	Other	NA
<b>14</b>	Does the Entity have a significant (10% or more) offshore customer base, either by number of customers or by revenues (where off-shore means not domiciled in the jurisdiction where bank services are being provided) ?	No
<b>14 a</b>	If Y, provide details of the country and %	
<b>15</b>	Select the closest value:	
<b>15 a</b>	Number of employees	10001+
<b>15 b</b>	Total Assets	Greater than \$500 million
<b>16</b>	Confirm that all responses provided in the above Section ENTITY & OWNERSHIP are representative of all the LE's branches	Yes
<b>16 a</b>	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
<b>16 b</b>	If appropriate, provide any additional information / context to the answers in this section.	

2. PRODUCTS & SERVICES		
17	Does the Entity offer the following products and services:	
17 a	Correspondent Banking	Yes
17 a1	If Y	
17 a2	Does the Entity offer Correspondent Banking services to domestic banks?	No
17 a3	Does the Entity allow domestic bank clients to provide downstream relationships?	Yes
17 a4	Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks?	No
17 a5	Does the Entity offer correspondent banking services to Foreign Banks?	Yes
17 a6	Does the Entity allow downstream relationships with Foreign Banks?	No
17 a7	Does the Entity have processes and procedures in place to identify downstream relationships with Foreign Banks?	Yes
17 a8	Does the Entity offer correspondent banking services to regulated MSBs/MVTS?	No
17 a9	Does the Entity allow downstream relationships with MSBs/MVTS?	No
17 a10	Does the Entity have processes and procedures in place to identify downstream relationships with MSB /MVTS?	Yes
17 b	Private Banking (domestic & international)	No
17 c	Trade Finance	Yes
17 d	Payable Through Accounts	No
17 e	Stored Value Instruments	No
17 f	Cross Border Bulk Cash Delivery	No
17 g	Domestic Bulk Cash Delivery	No
17 h	International Cash Letter	Yes
17 i	Remote Deposit Capture	Yes
17 j	Virtual /Digital Currencies	No
17 k	Low Price Securities	No
17 l	Hold Mail	No
17 m	Cross Border Remittances	No
17 n	Service to walk-in customers (non-account holders)	No
17 o	Sponsoring Private ATMs	No
17 p	Other high risk products and services identified by the Entity	NA
18	Confirm that all responses provided in the above Section PRODUCTS & SERVICES are representative of all the LE's branches	Yes
18 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
18 b	If appropriate, provide any additional information / context to the answers in this section.	Crédit Agricole Corporate and Investment Bank offers correspondent banking services on behalf of Crédit Agricole SA since January 2018

<b>3. AML, CTF &amp; SANCTIONS PROGRAMME</b>		
<b>19</b>	Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:	
<b>19 a</b>	Appointed Officer with sufficient experience/expertise	Yes
<b>19 b</b>	Cash Reporting	No
<b>19 c</b>	CDD	Yes
<b>19 d</b>	EDD	Yes
<b>19 e</b>	Beneficial Ownership	Yes
<b>19 f</b>	Independent Testing	Yes
<b>19 g</b>	Periodic Review	Yes
<b>19 h</b>	Policies and Procedures	Yes
<b>19 i</b>	Risk Assessment	Yes
<b>19 j</b>	Sanctions	Yes
<b>19 k</b>	PEP Screening	Yes
<b>19 l</b>	Adverse Information Screening	Yes
<b>19 m</b>	Suspicious Activity Reporting	Yes
<b>19 n</b>	Training and Education	Yes
<b>19 o</b>	Transaction Monitoring	Yes
<b>20</b>	How many full time employees are in the Entity's AML, CTF & Sanctions Compliance Department?	50+
<b>21</b>	Is the Entity's AML, CTF & Sanctions policy approved at least annually by the Board or equivalent Senior Management Committee?	Yes
<b>22</b>	Does the Board or equivalent Senior Management Committee receive regular reporting on the status of the AML, CTF & Sanctions programme?	Yes
<b>23</b>	Does the Entity use third parties to carry out any components of its AML, CTF & Sanctions programme?	Yes
<b>23 a</b>	If Y, provide further details	Only Crédit Agricole Group entities
<b>24</b>	Confirm that all responses provided in the above Section AML, CTF & SANCTIONS Programme are representative of all the LE's branches	Yes
<b>24 a</b>	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
<b>24 b</b>	If appropriate, provide any additional information / context to the answers in this section.	

4. ANTI BRIBERY & CORRUPTION		
25	Has the Entity documented policies and procedures consistent with applicable ABC regulations and requirements to [reasonably] prevent, detect and report bribery and corruption?	Yes
26	Does the Entity have an enterprise wide programme that sets minimum ABC standards?	Yes
27	Has the Entity appointed a designated officer or officers with sufficient experience/expertise responsible for coordinating the ABC programme?	Yes
28	Does the Entity have adequate staff with appropriate levels of experience/expertise to implement the ABC programme?	Yes
29	Is the Entity's ABC programme applicable to:	
29 a	Joint ventures	Yes
29 b	Third parties acting on behalf of the Entity	Yes
30	Does the Entity have a global ABC policy that:	
30 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
30 b	Includes enhanced requirements regarding interaction with public officials?	Yes
30 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
31	Does the Entity have controls in place to monitor the effectiveness of their ABC programme?	Yes
32	Does the Entity's Board or Senior Management Committee receive regular Management Information on ABC matters?	Yes
33	Does the Entity perform an Enterprise Wide ABC risk assessment?	Yes
33 a	If Y select the frequency	12 Months
34	Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment?	Yes

<b>35</b>	Does the Entity's ABC EWRA cover the inherent risk components detailed below:	
<b>35 a</b>	Potential liability created by intermediaries and other third-party providers as appropriate	Yes
<b>35 b</b>	Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries	Yes
<b>35 c</b>	Transactions, products or services, including those that involve state-owned or state-controlled entities or public officials	No
<b>35 d</b>	Corruption risks associated with gifts and hospitality, hiring/internships, charitable donations and political contributions	Yes
<b>35 e</b>	Changes in business activities that may materially increase the Entity's corruption risk	No
<b>36</b>	Does the Entity's internal audit function or other independent third party cover ABC Policies and Procedures?	Yes
<b>37</b>	Does the Entity provide mandatory ABC training to:	
<b>37 a</b>	Board and senior Committee Management	Yes
<b>37 b</b>	1st Line of Defence	Yes
<b>37 c</b>	2nd Line of Defence	Yes
<b>37 d</b>	3rd Line of Defence	Yes
<b>37 e</b>	3rd parties to which specific compliance activities subject to ABC risk have been outsourced	Not Applicable
<b>37 f</b>	Non-employed workers as appropriate (contractors/consultants)	Yes
<b>38</b>	Does the Entity provide ABC training that is targeted to specific roles, responsibilities and activities?	No
<b>39</b>	Confirm that all responses provided in the above Section Anti Bribery & Corruption are representative of all the LE's branches	Yes
<b>39 a</b>	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
<b>39 b</b>	If appropriate, provide any additional information / context to the answers in this section.	The policy regarding fight against corruption is to train all staff. Change in business activity, that may lead to materially increase the Entity's corruption risk are reviewed on a regular basis the CSP (Portfolio's Strategy Committee)".

5. POLICIES & PROCEDURES		
40	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report:	
40 a	Money laundering	Yes
40 b	Terrorist financing	Yes
40 c	Sanctions violations	Yes
41	Are the Entity's policies and procedures updated at least annually?	Yes
42	Are the Entity's policies and procedures gapped against/compared to:	
42 a	US Standards	Yes
42 a1	If Y, does the Entity retain a record of the results?	Yes
42 b	EU Standards	Yes
42 b1	If Y, does the Entity retain a record of the results?	Yes
43	Does the Entity have policies and procedures that:	
43 a	Prohibit the opening and keeping of anonymous and fictitious named accounts	Yes
43 b	Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs	No
43 c	Prohibit dealing with other entities that provide banking services to unlicensed banks	No
43 d	Prohibit accounts/relationships with shell banks	Yes
43 e	Prohibit dealing with another entity that provides services to shell banks	No
43 f	Prohibit opening and keeping of accounts for Section 311 designated entities	No
43 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
43 h	Assess the risks of relationships with PEPs, including their family and close associates	Yes
43 i	Define escalation processes for financial crime risk issues	Yes
43 j	Define the process, where appropriate, for terminating existing customer relationships due to financial crime risk	Yes
43 k	Specify how potentially suspicious activity identified by employees is to be escalated and investigated	Yes
43 l	Outline the processes regarding screening for sanctions, PEPs and negative media	Yes
43 m	Outline the processes for the maintenance of internal "watchlists"	Yes
44	Has the Entity defined a risk tolerance statement or similar document which defines a risk boundary around their business?	Yes
45	Does the Entity have a record retention procedures that comply with applicable laws?	Yes
45 a	If Y, what is the retention period?	5 years or more
46	Confirm that all responses provided in the above Section POLICIES & PROCEDURES are representative of all the LE's branches	Yes
46 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
46 b	If appropriate, provide any additional information / context to the answers in this section.	

Regarding question 43f, no USD transaction is allowed with Section 311 designated entities

6. AML, CTF & SANCTIONS RISK ASSESSMENT		
47	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:	
47 a	Client	Yes
47 b	Product	Yes
47 c	Channel	Yes
47 d	Geography	Yes
48	Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below:	
48 a	Transaction Monitoring	Yes
48 b	Customer Due Diligence	Yes
48 c	PEP Identification	Yes
48 d	Transaction Screening	Yes
48 e	Name Screening against Adverse Media & Negative News	Yes
48 f	Training and Education	Yes
48 g	Governance	Yes
48 h	Management Information	Yes
49	Has the Entity's AML & CTF EWRA been completed in the last 12 months?	No
49 a	If N, provide the date when the last AML & CTF EWRA was completed.	The first AML/CFT EWRA is expected to be completed around mid-2018
50	Does the Entity's Sanctions EWRA cover the inherent risk components detailed below:	
50 a	Client	Yes
50 b	Product	Yes
50 c	Channel	Yes
50 d	Geography	Yes
51	Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below:	
51 a	Customer Due Diligence	Yes
51 b	Transaction Screening	Yes
51 c	Name Screening	Yes
51 d	List Management	Yes
51 e	Training and Education	Yes
51 f	Governance	Yes
51 g	Management Information	Yes
52	Has the Entity's Sanctions EWRA been completed in the last 12 months?	Yes
52 a	If N, provide the date when the last Sanctions EWRA was completed.	
53	Confirm that all responses provided in the above Section AML, CTF & SANCTIONS RISK ASSESSMENT are representative of all the LE's branches	Yes
53 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
53 b	If appropriate, provide any additional information / context to the answers in this section.	



7. KYC, CDD and EDD		
54	Does the Entity verify the identity of the customer?	Yes
55	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
56	Which of the following does the Entity gather and retain when conducting CDD? Select all that apply:	
56 a	Ownership structure	Yes
56 b	Customer identification	Yes
56 c	Expected activity	Yes
56 d	Nature of business/employment	Yes
56 e	Product usage	Yes
56 f	Purpose and nature of relationship	Yes
56 g	Source of funds	Yes
56 h	Source of wealth	Yes
57	Are each of the following identified:	
57 a	Ultimate beneficial ownership	Yes
57 a1	Are ultimate beneficial owners verified?	Yes
57 b	Authorised signatories (where applicable)	Yes
57 c	Key controllers	Yes
57 d	Other relevant parties	Yes
58	What is the Entity's minimum (lowest) threshold applied to beneficial ownership identification ?	10%
59	Does the due diligence process result in customers receiving a risk classification?	Yes
60	If Y, what factors/criteria are used to determine the customer's risk classification? Select all that apply:	
60 a	Product Usage	Yes
60 b	Geography	Yes
60 c	Business Type/Industry	Yes
60 d	Legal Entity type	Yes
60 e	Adverse Information	Yes
60 f	Other (specify)	ownership structure

61	Does the Entity have a risk based approach to screening customers for adverse media/negative news?	Yes
62	If Y, is this at:	
62 a	Onboarding	Yes
62 b	KYC renewal	Yes
62 c	Trigger event	Yes
63	What is the method used by the Entity to screen for adverse media / negative news?	
63 a	Automated	Yes
63 b	Manual	Yes
63 c	Combination of automated and manual	Yes
64	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
65	If Y, is this at:	
65 a	Onboarding	Yes
65 b	KYC renewal	Yes
65 c	Trigger event	Yes
66	What is the method used by the Entity to screen PEPs?	
66 a	Automated	Yes
66 b	Manual	Yes
66 c	Combination of automated and manual	Yes
67	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
68	Does the Entity have a process to review and update customer information based on:	
68 a	KYC renewal	Yes
68 b	Trigger event	Yes
69	Does the Entity maintain and report metrics on current and past periodic or trigger event due diligence reviews?	Yes

<b>70</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>70 a</b>	Non-account customers	Prohibited
<b>70 b</b>	Offshore customers	EDD on a risk based approach
<b>70 c</b>	Shell banks	Prohibited
<b>70 d</b>	MVTS/ MSB customers	EDD & Restricted on a risk based approach
<b>70 e</b>	PEPs	EDD on a risk based approach
<b>70 f</b>	PEP Related	EDD on a risk based approach
<b>70 g</b>	PEP Close Associate	EDD on a risk based approach
<b>70 h</b>	Correspondent Banks	EDD on a risk based approach
<b>70 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>70 i</b>	Arms, defense, military	EDD & Restricted on a risk based approach
<b>70 j</b>	Atomic power	EDD & Restricted on a risk based approach
<b>70 k</b>	Extractive industries	EDD & Restricted on a risk based approach
<b>70 l</b>	Precious metals and stones	EDD & Restricted on a risk based approach
<b>70 m</b>	Unregulated charities	Prohibited
<b>70 n</b>	Regulated charities	EDD on a risk based approach
<b>70 o</b>	Red light business / Adult entertainment	EDD on a risk based approach
<b>70 p</b>	Non-Government Organisations	EDD & Restricted on a risk based approach
<b>70 q</b>	Virtual currencies	Prohibited
<b>70 r</b>	Marijuana	Prohibited
<b>70 s</b>	Embassies/Consulates	Prohibited
<b>70 t</b>	Gambling	EDD & Restricted on a risk based approach
<b>70 u</b>	Payment Service Provider	EDD & Restricted on a risk based approach
<b>70 v</b>	Other (specify)	
<b>71</b>	If restricted, provide details of the restriction	Sectoral policies are available on the Credit Agricole Corporate and Investment Bank website ( <a href="https://www.ca-cib.com/about-us/committed-and-responsible/our-sustainable-financing-policy">https://www.ca-cib.com/about-us/committed-and-responsible/our-sustainable-financing-policy</a> )
<b>72</b>	Does the Entity perform an additional control or quality review on clients subject to EDD?	Yes
<b>73</b>	Confirm that all responses provided in the above Section KYC, CDD and EDD are representative of all the LE's branches	Yes
<b>73 a</b>	If N, clarify which questions the difference/s relate to and the branch/es that this applies to	
<b>73 b</b>	If appropriate, provide any additional information / context to the answers in this section.	

8. MONITORING & REPORTING		
74	Does the Entity have risk based policies, procedures and monitoring processes for the identification and reporting of suspicious activity?	Yes
75	What is the method used by the Entity to monitor transactions for suspicious activities?	
75 a	Automated	Yes
75 b	Manual	Yes
75 c	Combination of automated and manual	Yes
76	If manual or combination selected, specify what type of transactions are monitored manually	All transactions are automatically monitored. Additionally a priori manual vigilance is applied and red flags lead to specific due diligence.
77	Does the Entity have regulatory requirements to report currency transactions?	No
77 a	If Y, does the Entity have policies, procedures and processes to comply with currency reporting requirements?	
78	Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity?	Yes
79	Confirm that all responses provided in the above Section MONITORING & REPORTING are representative of all the LE's branches	Yes
79 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to	
79 b	If appropriate, provide any additional information / context to the answers in this section.	
9. PAYMENT TRANSPARENCY		
80	Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards?	Yes
81	Does the Entity have policies, procedures and processes to [reasonably] comply with and have controls in place to ensure compliance with:	
81 a	FATF Recommendation 16	Yes
81 b	Local Regulations	Yes
81 b1	Specify the regulation	EU Regulation 2015/847
81 c	If N, explain	
82	Does the Entity have processes in place to respond to Request For Information (RFIs) from other entities in a timely manner?	Yes
83	Does the Entity have controls to support the inclusion of required and accurate originator information in international payment messages?	Yes

84	Does the Entity have controls to support the inclusion of required beneficiary in international payment messages?	Yes
85	Confirm that all responses provided in the above Section PAYMENT TRANSPARENCY are representative of all the LE's branches	Yes
85 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
85 b	If appropriate, provide any additional information / context to the answers in this section.	
<b>10. SANCTIONS</b>		
86	Does the Entity have a Sanctions Policy approved by management regarding compliance with sanctions law applicable to the Entity, including with respect its business conducted with, or through accounts held at foreign financial institutions?	Yes
87	Does the Entity have policies, procedures, or other controls reasonably designed to prevent the use of 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
88	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
89	Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists?	Yes
90	What is the method used by the Entity?	
90 a	Manual	Yes
90 b	Automated	Yes
90 c	Combination of Automated and Manual	Yes
91	Does the Entity screen all sanctions relevant data, including at a minimum, entity and location information, contained in cross border transactions against Sanctions Lists?	Yes
92	What is the method used by the Entity?	
92 a	Manual	Yes
92 b	Automated	Yes
92 c	Combination of Automated and Manual	Yes
93	Select the Sanctions Lists used by the Entity in its sanctions screening processes:	
93 a	Consolidated United Nations Security Council Sanctions List (UN)	Used for screening customers and beneficial owners and for filtering transactional data
93 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
93 c	Office of Financial Sanctions Implementation HMT (OFSI)	Used for screening customers and beneficial owners (i.e. reference data)
93 d	European Union Consolidated List (EU)	Used for screening customers and beneficial owners and for filtering transactional data
93 e	Lists maintained by other G7 member countries	

93 f	Other (specify)	
		Local lists, if applicable
94	When new entities and natural persons are added to sanctions lists, how many business days before the Entity updates its lists?	Same day to 2 days
95	When updates or additions to the Sanctions Lists are made, how many business days before the Entity updates their active manual and/or automated screening systems against:	
95 a	Customer Data	Same day to 2 days
95 b	Transactions	Same day to 2 days
96	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
97	Confirm that all responses provided in the above Section SANCTIONS are representative of all the LE's branches	Yes
97 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
97 b	If appropriate, provide any additional information / context to the answers in this section.	
<b>11. TRAINING &amp; EDUCATION</b>		
98	Does the Entity provide mandatory training, which includes :	
98 a	Identification and reporting of transactions to government authorities	Yes
98 b	Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered	Yes
98 c	Internal policies for controlling money laundering, terrorist financing and sanctions violations	Yes
98 d	New issues that occur in the market, e.g., significant regulatory actions or new regulations	Yes
98 e	Conduct and Culture	Yes
99	Is the above mandatory training provided to :	
99 a	Board and Senior Committee Management	Yes
99 b	1st Line of Defence	Yes
99 c	2nd Line of Defence	Yes
99 d	3rd Line of Defence	Yes
99 e	3rd parties to which specific FCC activities have been outsourced	Not Applicable
99 f	Non-employed workers (contractors/consultants)	Yes
100	Does the Entity provide AML, CTF & Sanctions training that is targeted to specific roles, responsibilities and high risk products, services and activities?	Yes

101	Does the Entity provide customised training for AML, CTF and Sanctions staff?	Yes
102	Confirm that all responses provided in the above Section TRAINING & EDUCATION are representative of all the LE's branches	Yes
102 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
102 b	If appropriate, provide any additional information / context to the answers in this section.	
<b>12. QUALITY ASSURANCE /COMPLIANCE TESTING</b>		
103	Are the Entity's KYC processes and documents subject to quality assurance testing?	Yes
104	Does the Entity have a program wide risk based Compliance Testing process (separate to the independent Audit function)?	Yes
105	Confirm that all responses provided in the above Section QUALITY ASSURANCE / COMPLIANCE TESTING are representative of all the LE's branches	Yes
105 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
105 b	If appropriate, provide any additional information / context to the answers in this section.	Quality assurance testing is performed by Compliance Controllers (separate from the audit function) on a risk-based approach
<b>13. AUDIT</b>		
106	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
107	How often is the Entity audited on its AML, CTF & Sanctions programme by the following:	
107 a	Internal Audit Department	Yearly
107 b	External Third Party	Component based reviews

<b>108</b>	Does the internal audit function or other independent third party cover the following areas:	
<b>108 a</b>	AML, CTF & Sanctions policy and procedures	Yes
<b>108 b</b>	KYC / CDD / EDD and underlying methodologies	Yes
<b>108 c</b>	Transaction Monitoring	Yes
<b>108 d</b>	Transaction Screening including for sanctions	Yes
<b>108 e</b>	Name Screening & List Management	Yes
<b>108 f</b>	Training & Education	Yes
<b>108 g</b>	Technology	Yes
<b>108 h</b>	Governance	Yes
<b>108 i</b>	Reporting/Metrics & Management Information	Yes
<b>108 j</b>	Suspicious Activity Filing	Yes
<b>108 k</b>	Enterprise Wide Risk Assessment	Yes
<b>108 l</b>	Other (specify)	
<b>109</b>	Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness?	Yes
<b>110</b>	Confirm that all responses provided in the above section, AUDIT are representative of all the LE's branches	No
<b>110 a</b>	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	Specific regimes for SAR's audit in line with local regulations (see Question 108j)
<b>110 b</b>	If appropriate, provide any additional information / context to the answers in this section.	



**Declaration Statement**

Wolfsberg Group Correspondent Banking Due Diligence Questionnaire 2018 (CBDDQ V1.2)

Declaration Statement (To be signed by Global Head of Correspondent Banking or equivalent position holder AND Group Money Laundering Prevention Officer, Global Head of Anti- Money Laundering, Chief Compliance Officer, Global Head of Financial Crimes Compliance OR equivalent)

Crédit Agricole CIB \_\_\_\_\_ (Bank name) is fully committed to the fight against financial crime and makes every effort to remain in full compliance with all applicable financial crime laws, regulations and standards in all of the jurisdictions in which it does business and holds accounts.

Crédit Agricole CIB \_\_\_\_\_ (Bank name) understands the critical importance of having effective and sustainable controls to combat financial crime in order to protect its reputation and to meet its legal and regulatory obligations.

Crédit Agricole CIB \_\_\_\_\_ (Bank name) recognises the importance of transparency regarding parties to transactions in international payments and has adopted/is committed to adopting these standards.

Crédit Agricole CIB \_\_\_\_\_ (Bank name) further certifies it complies with/is working to comply with the Wolfsberg Correspondent Banking Principles and the Wolfsberg Trade Finance Principles. The information provided in this Wolfsberg CBDDQ will be kept current and will be updated no less frequently than on an annual basis.

Crédit Agricole CIB \_\_\_\_\_ (Bank name) commits to file accurate supplemental information on a timely basis.

I, \_\_\_\_\_ (Global Head of Correspondent Banking or equivalent), certify that I have read and understood this declaration, that the answers provided in this Wolfsberg CBDDQ are complete and correct to my honest belief, and that I am authorised to execute this declaration on behalf of \_\_\_\_\_  
Crédit Agricole CIB

I, \_\_\_\_\_ (MLRO or equivalent), certify that I have read and understood this declaration, that the answers provided in this Wolfsberg CBDDQ are complete and correct to my honest belief, and that I am authorised to execute this declaration on behalf of \_\_\_\_\_  
Crédit Agricole CIB (Bank name)

\_\_\_\_\_  
(Signature & Date)

July 3, 2018

\_\_\_\_\_  
(Signature & Date)

July 3, 2018

**CREDIT AGRICOLE CIB - TABLE OF BRANCHES AND SUBSIDIARIES**

Branches Subsidiaries(*)	Area	Country	Address	Local Regulator (Name and Internet link)
Banco Credit Agricole Brasil*	America	Brazil	Alameda ITU, 852 16 Andar, Cerqueira Cesar CEP 01421-001, SAO PAULO BRAZIL	Central Bank of Brasil <a href="http://www.bcb.gov.br/pt-br#!/home">http://www.bcb.gov.br/pt-br#!/home</a> Comissão de Valores Mobiliários <a href="http://www.cvm.gov.br/">http://www.cvm.gov.br/</a>
Credit Agricole CIB Canada	America	Canada	2000 McGill College Ave, Suite 1900, H3A 3H3, Montréal CANADA	Bureau du surintendant des institutions financières Canada Office of the Superintendent of Financial Institutions Canada <a href="http://www.osfi-bsif.gc.ca/swppws/default.html">http://www.osfi-bsif.gc.ca/swppws/default.html</a>
Credit Agricole CIB Miami	America	United States	600 Brickell Ave 37th Floor Miami FL 33131 UNITED STATES	Federal reserve bank of Atlanta <a href="http://www.frbatlanta.org/">http://www.frbatlanta.org/</a>
Credit Agricole CIB New York	America	United States	1301 Avenue of the Americas New York NY 10019 UNITED STATES	Federal reserve bank of N.Y. <a href="http://www.ny.frb.org">http://www.ny.frb.org</a>
Credit Agricole CIB China*	Asia	China	12F, Office Tower 2, Plaza 66, N°1266 West Nanjing Road SHANGHAI 200040 CHINA	China Banking and Insurance Regulatory Commission <a href="http://www.cbrc.gov.cn/">http://www.cbrc.gov.cn/</a>
Credit Agricole CIB Hong Kong	Asia	Hong Kong	27/F Two Pacific Place, 88 Queensway HONG KONG	Hong Kong Monetary Authority <a href="http://www.info.gov.hk/hkma/">http://www.info.gov.hk/hkma/</a> Securities and Futures Commission <a href="http://www.sfc.hk">http://www.sfc.hk</a>
Credit Agricole CIB Mumbai	Asia	India	Hoechst House - 11th, 12th, 14th Floors, Nariman Point Mumbai 400021 INDIA	Reserve Bank of India <a href="http://www.rbi.org.in">http://www.rbi.org.in</a>
Credit Agricole CIB Tokyo	Asia	Japan	Shiodome Sumitomo Building, 15th floor, 1-9-2 Higashi-Shimbashi, Minato-ku 105-0021 Tokyo JAPAN	Financial Services Agency <a href="http://www.fsa.go.jp">www.fsa.go.jp</a>
Credit Agricole CIB Seoul Branch	Asia	Korea	21F Kyobo B/D 1, Chongro, Chongro-ku Seoul, 03154, KOREA	Financial Supervisory Service <a href="http://www.fss.or.kr">http://www.fss.or.kr</a> The Bank of Korea <a href="http://www.bok.or.kr/main/korMain.action#none">http://www.bok.or.kr/main/korMain.action#none</a> Financial Services Commission <a href="http://www.fsc.go.kr/index.jsp">http://www.fsc.go.kr/index.jsp</a>
Credit Agricole CIB Singapore	Asia	Singapore	168 Robinson Road, #23-01, Capital Tower SINGAPORE 068912	Monetary Authority of Singapore <a href="http://www.mas.gov.sg">http://www.mas.gov.sg</a>
Credit Agricole CIB Taipei	Asia	Taiwan	Hong Kuo Building - 16th Floor, N° 167 Tun Hua North Road 10549 Taipei TAIWAN	Financial Supervisory Commission <a href="http://www.fsc.gov.tw">http://www.fsc.gov.tw</a> Central Bank of the Republic of China <a href="http://www.cbc.gov.tw/mp1.html">http://www.cbc.gov.tw/mp1.html</a>
Credit Agricole CIB Belgium	Europe	Belgium	120 chaussée de La Hulpe 1000 Bruxelles BELGIQUE	Banque Nationale de Belgique <a href="http://www.bnb.be">http://www.bnb.be</a> Autorité des services et marchés financiers <a href="http://www.fsma.be/en.aspx">http://www.fsma.be/en.aspx</a>
Credit Agricole CIB Helsinki	Europe	Finland	Aleksanterinkatu 15 B, P.O. Box 688 00101 Helsinki 10 FINLAND	Financial Supervisory Authority (FIN-FSA), <a href="http://www.finansinspektionen.fi/en/Pages/Default.aspx">http://www.finansinspektionen.fi/en/Pages/Default.aspx</a>
Ester Finance Titrisation*	Europe	France	12 place des Etats Unis 92120 MONTROUGE FRANCE	Autorité de contrôle prudentiel et de résolution <a href="https://acpr.banque-france.fr/">https://acpr.banque-france.fr/</a>

Branches Subsidiaries(*)	Area	Country	Address	Local Regulator (Name and Internet link)
Credit Agricole CIB Germany	Europe	Germany	Taunusanlage 14 60325 Frankfurt am Main GERMANY	BaFin - Federal Financial Supervisory Authority <a href="http://www.bafin.de">http://www.bafin.de</a> Deutsche Bundesbank <a href="http://www.bundesbank.de/">http://www.bundesbank.de/</a>
Credit Agricole CIB Milan	Europe	Italy	Piazza Cavour, 2 20121 Milano ITALY	Bank of Italy <a href="http://www.bancaditalia.it">http://www.bancaditalia.it</a> Consob <a href="http://www.consob.it">http://www.consob.it</a>
Credit Agricole CIB Luxembourg	Europe	Luxembourg	39 allée Scheffer 2520 Luxembourg LUXEMBOURG	Commission de Surveillance du Secteur Financier (CSSF) <a href="http://www.cssf.lu">http://www.cssf.lu</a>
Credit Agricole CIB AO*	Europe	Russia	12, Nevsky prospect, Saint-Petersburg 191186 RUSSIA	Central Bank of the Russian Federation <a href="http://www.cbr.ru/">http://www.cbr.ru/</a>
Credit Agricole CIB Madrid	Europe	Spain	Paseo de la Castellana, 1 28046 Madrid SPAIN	Regulator for Banking activities Banco de España <a href="http://www.bde.es/bde/en/">http://www.bde.es/bde/en/</a> For the activities on securities CNMV <a href="http://www.cnmv.es">http://www.cnmv.es</a>
Credit Agricole CIB Sweden	Europe	Sweden	Regeringsgatan 38 P.O. Box 7734 103 95 Stockholm SWEDEN	Finansinspektionen <a href="http://www.fi.se/Folder-EN/Startpage/">http://www.fi.se/Folder-EN/Startpage/</a>
Credit Agricole CIB London	Europe	United Kingdom	Broadwalk House 5 Appold Street EC2A 2DA London UNITED KINGDOM	FCA (Financial Conduct Authority) <a href="http://www.fca.org.uk/">http://www.fca.org.uk/</a> Prudential Regulation Authority <a href="http://www.pfca.org.uk/financial-claims/organisations/prudential-regulatory-authority.html">http://www.pfca.org.uk/financial-claims/organisations/prudential-regulatory-authority.html</a>
Credit Agricole CIB Algerie Bank SPA*	Middle East and North Africa	Algeria	Immeuble Algeria Business Center El Mohammadia Les Pins Maritimes 16000, ALGER ALGERIE	BANQUE D'ALGERIE <a href="http://www.bank-of-algeria.dz">http://www.bank-of-algeria.dz</a>
Credit Agricole CIB DIFC	Middle East and North Africa	United Arab Emirates	Office Number 2101-2201 Al Fattan Currency House Level 21 and 22 Al Fattan Area- DIFC PO BOX 506 611 Dubai UAE	Dubai Financial Services Authority <a href="https://www.dfsa.ae/">https://www.dfsa.ae/</a>
Credit Agricole CIB UAE	Middle East and North Africa	United Arab Emirates	DUBAI Branch: The Maze Tower – Level 14 P.O. Box 9256 Sheikh Zayed Road DUBAI ABU DHABI Branch: Level 5, Al Muhairy Centre Sheikh Zayed the First Street P.O.Box 4725 – Abu Dhabi U.A.E.	Central Bank of United Arab Emirates <a href="http://www.centralbank.ae">http://www.centralbank.ae</a>