

Crédit Agricole CIB is strongly committed to participating in international efforts to combat money laundering and terrorist financing (AML/CFT). To that end, it has implemented a global financial security program.

This program is based on international standards on AML/CFT, the French and European laws and regulations, as well as the AML/CFT laws and regulations applicable in the jurisdictions where CACIB operates. CACIB also follows the Credit Agricole SA group policy.

CACIB also is strongly committed to compliance with the International Sanctions imposed by the United Nations, the European Union, France, the United States as well as the applicable local sanctions measures. For more details, please refer to the Crédit Agricole Group *Major Sanctioned Countries Questionnaire*.

The Financial Security program is designed to address AML/CFT, International Sanctions, including issues related to circumvention of Sanctions, as well as Anti-Bribery and Corruption. It consists of procedures on:

- client identification policy implementing a risk-based approach (*i.e.*, Know Your Customer, customer risk level, KYC update);
- transactions monitoring in accordance with the embargoes and asset freezing measures, the rules on the transparency of transfers of funds, and for AML/CTF purposes;
- enhanced review and reporting of suspicious transactions and activities to the Financial Intelligence Unit;
- employees training;
- monitoring compliance with the procedures and measures put in place to meet the above mentioned obligations;
- documentation, archiving and retention of records and information sharing.

These procedures are reviewed whenever necessary and at least once a year. They apply to all CACIB entities, including those located abroad.

CACIB has set a dedicated governance and an internal control framework to ensure compliance with its AML/CFT obligations and the applicable Sanctions programs.

As a credit and financial institution, CACIB is subject to the monitoring and control of the *Autorité de Contrôle Prudentiel et de Résolution* and the *Autorité des Marchés Financiers*, French supervisory authorities of the banking and financial sectors.

Global Head of Financial Security
Crédit Agricole Corporate and Investment Bank
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