



BNP PARIBAS

Financial Institution Name (FI): BNP PARIBAS

Location : 16, Boulevard des Italiens – 75009 PARIS

Anti-Money Laundering Questionnaire

Answers to the following questionnaire cover all BNP Paribas Group (BNP Paribas S.A, subsidiaries¹ and branches).

I. General AML Policies, Practices and Procedures:	YES	NO
1. Is the AML compliance program approved by the FI's board or a senior committee?	Y • See Additional information	N •
2. Does the FI have a legal and regulatory compliance program that includes a designated officer that is responsible for coordinating and overseeing the AML framework?	Y •	N •
3. Has the FI developed written policies documenting the processes that they have in place to prevent, detect and report suspicious transactions?	Y •	N •
4. In addition to inspections by the government supervisors/regulators, does the FI have an internal audit function or other independent third party that assesses AML policies and practices on a regular basis?	Y •	N •
5. Does the FI have a policy prohibiting accounts/relationships with shell banks? (A shell bank is defined as a bank incorporated in a jurisdiction in which it has no physical presence and which is unaffiliated with a regulated financial group).	Y •	N •
6. Does the FI have policies to reasonably ensure that they will not conduct transactions with or on behalf of shell banks through any of its accounts or products?	Y •	N •
7. Does the FI have policies covering relationships with Politically Exposed Persons (PEP's), their family and close associates?	Y •	N •
8. Does the FI have record retention procedures that comply with applicable law?	Y •	N •
9. Are the FI's AML policies and practices being applied to all branches and subsidiaries of the FI both in the home country and in locations outside of that jurisdiction?	Y •	N •

(1) For the purposes of the present letter, the term « subsidiary » refers to any company bound by the AML/FT regulations in which our Bank holds more than 50% of the voting rights.



II. Risk Assessment :		YES	NO
10. Does the FI have a risk-based assessment of its customer base and their transactions?	Y •		N •
11. Does the FI determine the appropriate level of enhanced due diligence necessary for those categories of customers and transactions that the FI has reason to believe pose a heightened risk of illicit activities at or through the FI?	Y •		N •
III. Know Your Customer, Due Diligence and Enhanced Due Diligence:		YES	NO
12. Has the FI implemented processes for the identification of those customers on whose behalf it maintains or operates accounts or conducts transactions?	Y •		N •
13. Does the FI have a requirement to collect information regarding its customers' business activities?	Y •		N •
14. Does the FI assess its FI customers' AML policies or practices?	Y •		N •
15. Does the FI have a process to review and, where appropriate, update customer information relating to high risk client information?	Y •		N •
16. Does the FI have procedures to establish a record for each new customer of their respective identification documents and "Know Your Customer" information?	Y •		N •
17. Does the FI complete a risk-based assessment to understand the normal and expected transactions of its customers?	Y •		
IV. Reportable Transactions and Prevention and Detection of Transactions with Illegally Obtained Funds:		YES	NO
18. Does the FI have policies or practices for the identification and reporting of transactions that are required to be reported to the authorities?	Y •		N •
19. Where cash transaction reporting is mandatory, does the FI have procedures to identify transactions structured to avoid such obligations?	Y •		N •
20. Does the FI screen customers and transactions against lists of persons, entities or countries issued by government/competent authorities?	Y •		N •
21. Does the FI have policies to reasonably ensure that it only operates with correspondent banks that possess licenses to operate in their countries of origin?	Y •		N •
22. Does the FI adhere to the Wolfsberg Transparency Principles and the appropriate usage of the SWIFT MT 202/202COV and MT 205/205COV message formats ? ²	Y •		N •

(2) The four payment message standards to be observed are: i) FIs should not omit, delete, or alter information in payment messages or orders for the purpose of avoiding detection of that information by any other FI in the payment process; ii) FIs should not use particular payment message for the purpose of avoiding detection of information by any other FI in payment process; iii) Subject to applicable laws, FIs should cooperate as fully as practicable with other FIs in the payment process when requesting to provide information about the parties involved; and (iv) FIs should strongly encourage their correspondent banks to observe these principles.

Source :

[http://www.wolfsberg-principles.com/pdf/standards/Wolfsberg_NYCH_Statement_on_Payment_Message_Standards_\(2007\).pdf](http://www.wolfsberg-principles.com/pdf/standards/Wolfsberg_NYCH_Statement_on_Payment_Message_Standards_(2007).pdf)




V. Transaction monitoring:	<u>YES</u>	<u>NO</u>
23. Does the FI have a monitoring program for unusual and potentially suspicious activity that covers funds transfers and monetary instruments such as travelers checks, money orders, etc.?	Y •	N •

VI. AML Training:	<u>YES</u>	<u>NO</u>
24. Does the FI provide AML training to relevant employees that includes: <ul style="list-style-type: none"> • Identification and reporting of transactions that must be reported to government authorities. • Examples of different forms of money laundering involving the FI's products and services. • Internal policies to prevent money laundering. 	Y •	N •
25. Does the FI retain records of its training sessions including attendance records and relevant training materials used?	Y •	N •
26. Does the FI communicate new AML related laws or changes to existing AML related policies or practices to relevant employees?	Y •	N •
27. Does the FI employ third parties to carry out some of the functions of the FI?	Y •	N •
28. If the answer to question 27 is yes, does the FI provide AML training to relevant third parties that includes: <ul style="list-style-type: none"> • Identification and reporting of transactions that must be reported to the authorities. • Examples of different forms of money laundering involving the FI's products and services. • Internal policies to prevent money laundering. 	Y •	N •

Additional information :

Question 1: The program of compliance as regards fight against the money laundering was approved by the Chief Executive Officer of the BNP Paribas Group.

Nom/Name : Jean CLAMON
Titre/Title : Managing Director – Head of Compliance and Internal Control coordination
Signature : 
Date : 27/05/2014