the Wolfsberg Group

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UNION DE BANQUES ARABES ET FRANCAISES - U.B.A.F

Location (Country):

France

The questionnaire is required to be answered on a Legal Entity (LE) Level. The Financial institution should answer the questionnaire at the legal entity level including any branches for which the client base, products and control model are materially similar to the LE Head Office. This questionnaire should not cover more than one LE. Each question in the CBDDQ 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 differs for one of its branches, this needs to be highlighted and details regarding this difference captured at the end of each sub-section. If a branch's business activity (products offered, client base etc.) is materially different than its Entity Head Office, a separate questionnaire can be completed for that branch.

No#	Question	Answer
1. ENTI	TY & OWNERSHIP	
1	Full Legal Name	UNION DE BANQUES ARABES ET FRANCAISES - U.B.A.F
2	Append a list of foreign branches which are covered by this questionnaire	Branches covered by this questionnaire : Japan Branch, South Korea Branch, Singapore Branch
3	Full Legal (Registered) Address	Tour EQHO - 2, avenue Gambetta- 92066 Paris La Défense Cedex FRANCE
4	Full Primary Business Address (if different from above)	Tour EQHO - 2, avenue Gambetta- 92066 Paris La Défense Cedex FRANCE
5	Date of Entity incorporation/ establishment	June 10, 1970
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 с	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	CREDIT AGRICOLE CORPORATE AND INVESTMENT BANK - CACIB for 47,01 % UBAC NEDERLAND B.V. for 23,12 % Banque Extérieure d'Algérie for 9,35 % directly and 2,73 % indirectly (through UBAC Nederland)
7	% of the Entity's total shares composed of bearer shares	No bearer shares. The capital is divided into 1,638,740 shares that grant identical rights, with a nominal value distributed in two classes: A) shares held by Arab shareholders, representing 52.99% of the capital-B) shares nearly all held by Crédit Agricole CIB - France for 47,01% which is our reference shareholder.
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	Name of primary financial regulator / supervisory authority	S.A. CAPITAL 250.727.220 € RCS NANTERRE B 702 027 178 TOUR EQHO 2, avenue Gambetta

92066 Paris La Défense Cedex Tél. : 33 (0)1 46 40 61 01 - Fax : 33 (0)1 47 38 13 88

Wolfsberg Group Correspondent Banking Due Diligence Questionnaire (CBDDQ) V1.3

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10	Provide Legal Entity Identifier (LEI) if available	9695003L8X241KRTAG54
11	Provide the full legal name of the ultimate parent (if different from the Entity completing the DDQ)	Not Applicable according to the Wolfsberg Glossary definition.
12	Jurisdiction of licensing authority and regulator of ultimate parent	
13	Select the business areas applicable to the	N/A
13 a	Retail Banking	No
13 b	Private Banking / Wealth Management	
13 c	Commercial Banking	No
13 d	Transactional Banking	Yes
13 e	Investment Banking	Yes
13 f	Financial Markets Trading	No
13 g	Securities Services / Custody	No
13 h	Broker / Dealer	No
13 i		No:
ł	Multilateral Development Bank	No
13 ј	Other	U.B.A.F core business focusses on International Trade Financing with all forms of documentary activity as well as related commercial financing and issuance of guarantees. Additionaly U.B.A.F. participates into islamic banking financing.
14	Does the Entity have a significant (10% or more) portfolio of non-resident customers or does it derive more than 10% of its revenue from non-resident customers? (Non-resident means customers primarily resident in a different jurisdiction to the location where bank services are provided.)	Yes
14 a	If Y, provide the top five countries where the non-resident customers are located.	As of 31/12/2021, the top five countries were: Egypt, Iraq, Bangladesh, Soutk Korea and Tunisia
15	Select the closest value:	
15 a	Number of employees	201-500
15 b	Total Assets	Greater than \$500 million
16	Confirm that all responses provided in the above Section ENTITY & OWNERSHIP are representative of all the LE's branches	Yes
16 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
16 b	If appropriate, provide any additional information / context to the answers in this section.	
and the second second	DUCTS & 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
	1	

19 b 19 c	Cash Reporting	Not Applicable
19 a	minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise	Yes
19	Does the Entity have a programme that sets	
	CTF & SANCTIONS PROGRAMME	
18 b	If appropriate, provide any additional information / context to the answers in this section.	17m: In the frame of UBAF Trade Finance activity only. 17n: UBAF does not provide any walk-in customer activity but deals with a number of customers that are not holding any current account with (so-called non-account customer in Q 70a) for its Trade Finance related activities as detailed in field 70v.
18 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
18	Confirm that all responses provided in the above Section PRODUCTS & SERVICES are representative of all the LE's branches	Yes
17 p	Other high risk products and services identified by the Entity	N/A
17 o	Sponsoring Private ATMs	No
17 n	Service to walk-in customers (non-account holders)	No
17 m	Cross Border Remittances	Yes
17	Hold Mail	No
17 k	Low Price Securities	No
17 j	Virtual /Digital Currencies	No
17 l	Remote Deposit Capture	No
17 h	International Cash Letter	No
17 g	Domestic Bulk Cash Delivery	No
17 f	Cross Border Bulk Cash Delivery	No
17 e	Stored Value Instruments	No
17 d	Payable Through Accounts	No
17 c	Trade Finance	Yes
	with MSB /MVTS? Private Banking (domestic & international)	No
17 a10	Does the Entity have processes and procedures in place to identify downstream relationships	Yes
17 a9	Does the Entity allow downstream relationships with MSBs/MVTS?	No
17 a8	with Foreign Banks? Does the Entity offer correspondent banking services to regulated MSBs/MVTS?	No
17 a7	Does the Entity have processes and procedures in place to identify downstream relationships	Yes
17 a6	Does the Entity allow downstream relationships with Foreign Banks?	No
17 a5	Does the Entity offer correspondent banking services to Foreign Banks?	Yes
	Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks?	Yes
	provide downstream relationships?	No

19 e	Beneficial Ownership	Yes
19 f	Independent Testing	Yes
19 g	Periodic Review	Yes
19 h	Policies and Procedures	Yes
19 i	Risk Assessment	Yes
19 j	Sanctions	Yes
19 k	PEP Screening	Yes
19	Adverse Information Screening	Yes
19 m	Suspicious Activity Reporting	Yes
19 n	Training and Education	Yes
19 o	Transaction Monitoring	Yes
20	How many full time employees are in the Entity's AML, CTF & Sanctions Compliance Department?	10-50
21	Is the Entity's AML, CTF & Sanctions policy approved at least annually by the Board or equivalent Senior Management Committee?	Yes
22	Does the Board or equivalent Senior Management Committee receive regular reporting on the status of the AML, CTF & Sanctions programme?	Quarterly/Every three months
23	Does the Entity use third parties to carry out any components of its AML, CTF & Sanctions programme?	Yes
23 a	If Y, provide further details	Credit Agricole SA (parent company of UBAF main shareholder) for the technical setup of the filtering of SWIFT fiancial messages.
24	Confirm that all responses provided in the above Section AML, CTF & SANCTIONS Programme are representative of all the LE's branches	Yes
24 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
24 b	If appropriate, provide any additional information / context to the answers in this section.	
	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:	Third parties acting on behalf of the Entity
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
P	<u> </u>	

30 b	Includes enhanced requirements regarding interaction with public officials?	Yes
30 с	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	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	Yes
35	Does the Entity's ABC EWRA cover the inherent risk components detailed below:	
35 a	Potential liability created by intermediaries and other third-party providers as appropriate	Yes
35 b	Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries	Yes
35 с	Transactions, products or services, including those that involve state-owned or state-controlled entities or public officials	Yes
35 d	Corruption risks associated with gifts and hospitality, hiring/internships, charitable donations and political contributions	Yes
35 e	Changes in business activities that may materially increase the Entity's corruption risk	Yes
36	Does the Entity's internal audit function or other independent third party cover ABC Policies and Procedures?	Yes
37	Does the Entity provide mandatory ABC training to:	
37 a	Board and senior Committee Management	Yes
37 b	1st Line of Defence	Yes
37 c	2nd Line of Defence	Yes
37 d	3rd Line of Defence	Yes
37 е	3rd parties to which specific compliance activities subject to ABC risk have been outsourced	Not Applicable
37 f	Non-employed workers as appropriate (contractors/consultants)	Yes
38	Does the Entity provide ABC training that is targeted to specific roles, responsibilities and activities?	Yes
39	Confirm that all responses provided in the above Section Anti Bribery & Corruption are representative of all the LE's branches	Yes
39 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
39 b	If appropriate, provide any additional information / context to the answers in this section.	Answer Yes to question 35c relates to armament and defense transactions.
5. AML	CTF & SANCTIONS POLICIES & PROC	EDURES
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
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40 b	Terrorist financing	Yes
40 с	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	Yes
43 c	Prohibit dealing with other entities that provide banking services to unlicensed banks	Yes
43 d	Prohibit accounts/relationships with shell banks	Yes
43 e	Prohibit dealing with another entity that provides services to shell banks	Yes
43 f	Prohibit opening and keeping of accounts for Section 311 designated entities	Yes
43 g	Prohibit opening and keeping of accounts for any of unlicensed/unregulated remittance agents, exchanges houses, casa de cambio,	Yes
43 h	bureaux de change or money transfer agents Assess the risks of relationships with domestic and foreign 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 1	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.	
6. AML	CTF & SANCTIONS RISK ASSESSMEN	
47	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:	
47 a	Client	Yes
47 b	Product	Yes
	<u> </u>	I

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?	Yes
49 a	If N, provide the date when the last AML & CTF EWRA was completed.	Yes
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:	Yes
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. KVC, CDD and EDD 5	7 KVC	CDD and EDD	
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when CDD must be completed, e.g. at the time of orhoboarding or within 30 depty gainer and release when conducting CDD? Saled all and release when conducting CDD? Saled all and selection of the following does the Entity gainer and release when conducting CDD? Saled all selections of the Complete of CDP Saled all selections of the Complete of CDP Saled all selections of the Complete of CDP Saled and Saled		customer?	Yes
and retain when conducting CDD? Select all that apply: \$6 a		when CDD must be completed, e.g. at the time	Yes
Se b Customer identification Yes 56 c Expected activity Yes 56 d Nature of business/employment 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 funds Yes 56 h Source of funds Yes 57 Are each of the following identified: 57 a Ultimate beneficial ownership 78 s Yes 57 at Are ultimate beneficial ownership 79 s Yes 57 at Are ultimate beneficial owners verified? 70 b Authorised signatories (where applicable) 70 ves 71 d Are ultimate beneficial ownership 72 s (Key controllers Yes 73 d Other relevant parties 74 d Other relevant parties 75 d Other relevant partie		and retain when conducting CDD? Select all	
Fes capacited activity Yes 56 c Expected activity Yes 56 c 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 at Are ultimate beneficial ownership Yes 57 at Other relevant parties Orientors (Chairman, Vice Chairman, Chief Executive Officers and deputy CEOs, Board Members), Compliance officer deals. What is the Entity's minimum (lowest) threshold spipled to beneficial ownership identification 7 59 Obes the due dispence process result in customine relovance in the custominer's rick classification? Solect all that apply. 60 a Product Usage Yes 60 a Product Usage Yes 60 a Resiness Typerificiation Yes 60 c Business Typerificiation Yes 60 d Legal Entity type Yes 60 d Avairs information Yes 60 f Other (specify) Sincolinear of Politically Exposed Person (PEP) and their family members as Ultimate beneficial ownership completed and ownership, complete ownership, entered in Solectic and ownership, complete ownership, complete ownership, entered in Ordinary genesion in O			Yes
Section Sect	56 b	Customer identification	Yes
Yes 56 e Product usage Yes 56 f Purpose and nature of retationship Yes 56 g Source of funds Yes 57 Are each of the following identified: 77 a Ultimate beneficial ownership Yes 57 at Are ultimate beneficial ownership Yes 57 at Authorised signatories (where applicable) Yes 57 b Authorised signatories (where applicable) Yes 57 c Key controllers Yes 57 d Other relevant parties Other relevant parties Other relevant parties Other details 10% 59 Does the du diffector process result in yes 10% 10% 10% 10% 10% 10% 10 Customers receiving a risk classification? Select all that apply 10 Customers receiving a risk classification? Select all that apply 10 Customers received the customer's risk classification? Select all that apply 10 Customers received the customer's risk classification? Yes 10 Customers received the customer's risk classification? Select all that apply 10 Customers received the customer's risk classification? Select all that apply 10 Customers risk classification? Select all that apply 11 Customers risk classification? Select all that apply 12 Customers risk classification? Select all that apply 13 Customers risk classification? Select all that apply 14 Customers risk classification? Select all that apply 15 Customers risk classification? Select all that apply 16 Customers risk classification? Select all that apply 17 Customers risk classification? Select all that apply 18 Customers risk classification? Select all that apply 19 Customers risk classification? Select all that apply 10 Customers risk classificatio	56 с	Expected activity	Yes
Yes	56 d	Nature of business/employment	Yes
Se g Source of funds Yes Yes Source of wealth Yes Source of wealth Yes The ach of the following identified: The ach of the	56 e	Product usage	Yes
Source of wealth Source of wealth Yes 7 a Vitimate beneficial ownership Yes 7 at Are ultimate beneficial owners verified? Yes 7 at Are ultimate beneficial owners verified? Yes 7 at Are ultimate beneficial owners verified? Yes 7 b Authorised signatories (where applicable) Yes 7 c Key controllers Yes 7 d Other relevant parties Other relevant parties Other relevant parties Other details What is the Entity's minimum (lowest) threshold applied to beneficial ownership identification? Does the due diligence process result in customers receiving a risk classification? If Y, what factoris/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 d Adverse Information Yes 61 Other (specify) The Authorised signatories (where applicable) Yes 62 a Other parties First Authorised signatories (where applicable) Yes 63 d Other (specify) The Authorised signatories (where applicable) Yes 64 d Oos the Entity have a risk based approach to screening customers for adverse medialnegative news? Yes 65 b KYC senewal	56 f	Purpose and nature of relationship	Yes
Are each of the following identified: 7 a Ultimate beneficial ownership 7 a 1 Are ultimate beneficial owners verified? 7 yes 7 a 1 Are ultimate beneficial owners verified? 7 yes 7 b Authorised signatories (where applicable) 7 c Key controllers 7 d Other relevant parties 7 d Other relevant parties 7 d Other relevant parties 8 d Other relevant parties 9	56 g	Source of funds	Yes
57 a Ultimate beneficial ownership Yes 77 a1 Are ultimate beneficial owners verified? Yes 77 b Authorised signatories (where applicable) Yes 77 c Key controllers Yes 78 d Other relevant parties Other relevant parties Other relevant parties Other relevant parties What is the Entity's minimum (lowest) threshold applied to beneficial ownership identification? ODE best due diligence process result in customers receiving a risk classification? If If y Awhat factor/scriteria 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 d Legal Entity type Yes 60 d Adverse Information Yes 60 of Other (specify) Chief (specif	56 h	Source of wealth	Yes
78 Are ultimate beneficial owners verified? 79 Authorised signatories (where applicable) 79 Authorised signatories (where applicable) 79 Cessory 70 Cessory 70 Other relevant parties 70 Other relevant parties 71 Other relevant parties 72 Ober between the due diligence process result in customers receiving a risk classification? 73 Ober between the due diligence process result in customers receiving a risk classification? 74 Ves 75 Ober between the due diligence process result in customers receiving a risk classification? 75 Ober between the due diligence process result in customers receiving a risk classification? 76 Other (what factors/circleria are used to determine the customer's risk classification? Select all that apply: 76 Other (specify) 76 Other (specify) 77 Other (specify) 78 Other (specify)	57	Are each of the following identified:	
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Yes 7 c Key controllers 7 c Key controllers 7 c Yes 7 c Other relevant parties 8 c What is the Entity's minimum (lowest) threshold applied to beneficial ownership identification? 9 Des the due diffigure process result in customers receiving a risk classification? 9 C Product Usage 7 c Yes 8 d Business Type/Industry 7 c Yes 8 d G G C Business Type/Industry 8 d G G C Business Type/Industry 9 c S C C C C C C C C C C C C C C C C C C	57 a1	Are ultimate beneficial owners verified?	Yes
Other relevant parties Other	57 b	Authorised signatories (where applicable)	Yes
officer details 58 What is the Entity's minimum (lowest) threshold applied to beneficial ownership identification? 59 Does the due diligence process result in customers receiving a risk classification? 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 d Legal Entity type Yes 60 e Adverse Information Yes 60 for Other (specify) Involment of Politically Exposed Persons (PEP) and their family members as Ultimate beneficial owners, commercial and/or financial sanctions, activities and/or presence in countries under sanctions/embargo, type of ownership, complex ownership, answers to Wolfsberg questionnaire 61 Does the Entity have a risk based approach to screening customers for adverse media/negative news? 62 If Y, is this at: 63 Dohoarding Yes 64 KYC renewal	57 c	Key controllers	
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Geography Yes Go c Business Type/Industry Yes Go d Legal Entity type Yes Go e Adverse Information Yes Involment of Politically Exposed Persons (PEP) and their family members as Ultimate beneficial owners, commercial and/or financial sanctions, activities and/or presence in countries under sanctions/embargo, type of ownership, complex ownership, answers to Wolfsberg questionnaire Go bes the Entity have a risk based approach to screening customers for adverse media/negative news? Go If Y, is this at: Go Onboarding Yes KYC renewal	60	the customer's risk classification? Select all that	
60 c Business Type/Industry Yes 60 d Legal Entity type Yes 60 e Adverse Information Yes 60 f Other (specify) Involment of Politically Exposed Persons (PEP) and their family members as Ultimate beneficial owners, commercial and/or financial sanctions, activities and/or presence in countries under sanctions/embargo, type of ownership, complex ownership, answers to Wolfsberg questionnaire 61 Does the Entity have a risk based approach to screening customers for adverse media/negative news? 62 If Y, is this at: 63 Onboarding Yes KYC renewal	60 a	Product Usage	Yes
Yes 60 d Legal Entity type Yes 60 e Adverse Information Yes Involment of Politically Exposed Persons (PEP) and their family members as Ultimate beneficial owners, commercial and/or financial sanctions, activities and/or presence in countries under sanctions/embargo, type of ownership, complex ownership, answers to Wolfsberg questionnaire 61 Does the Entity have a risk based approach to screening customers for adverse media/negative news? 62 If Y, is this at: 63 Doboarding Yes 64 NC renewal	60 b	Geography	Yes
Adverse Information Yes Other (specify) Other (specify) Involment of Politically Exposed Persons (PEP) and their family members as Ultimate beneficial owners, commercial and/or financial sanctions, activities and/or presence in countries under sanctions/embargo, type of ownership, complex ownership, answers to Wolfsberg questionnaire Does the Entity have a risk based approach to screening customers for adverse media/negative news? If Y, is this at: Yes Yes KYC renewal	60 c	Business Type/Industry	Yes
Other (specify) Other (specify) Involment of Politically Exposed Persons (PEP) and their family members as Ultimate beneficial owners, commercial and/or financial sanctions, activities and/or presence in countries under sanctions/embargo, type of ownership, complex ownership, answers to Wolfsberg questionnaire Does the Entity have a risk based approach to screening customers for adverse media/negative news? If Y, is this at: Onboarding Yes Yes	60 d	Legal Entity type	Yes
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screening customers for adverse media/negative news? 62 If Y, is this at: 62 a Onboarding Yes 62 b KYC renewal	60 f		commercial and/or financial sanctions, activities and/or presence in countries under sanctions/embargo, type of
62 a Onboarding Yes	61	screening customers for adverse	Yes
62 b KYC renewal	62	If Y, is this at:	
62 b KYC renewal	62 a	Onboarding	Yes
Yes	62 b	KYC renewal	Yes
62 c Trigger event Yes	62 c	Trigger event	Yes
What is the method used by the Entity to screen for adverse media / negative news?	63		Manual

	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 с	Trigger event	Yes
66	What is the method used by the Entity to screen PEPs?	Combination of automated and manual
	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
	Does the Entity have a process to review and update customer information based on:	
68 a	KYC renewal	Yes
68 b	Trigger event	Yes
	Does the Entity maintain and report metrics on current and past periodic or trigger event due diligence reviews?	Yes
	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?	
70 a	Non-account customers	EDD & restricted on a risk based approach
70 b	Non-resident customers	EDD & restricted on a risk based approach
70 c	Shell banks	Prohibited
70 d	MVTS/ MSB customers	Prohibited
70 e	PEPs	Prohibited
70 f	PEP Related	Prohibited
70 g	PEP Close Associate	Prohibited
70 h	Correspondent Banks	EDD & restricted on a risk based approach
	If EDD or EDD & restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2014?	Yes
70 i	Arms, defense, military	EDD & restricted on a risk based approach
70 j	Atomic power	Prohibited
70 k	Extractive industries	Prohibited
70 1	Precious metals and stones	Prohibited
70 m	Unregulated charities	Prohibited
70 n	Regulated charities	Prohibited
70 o	Red light business / Adult entertainment	Prohibited
70 p	Non-Government Organisations	Prohibited
70 q	Virtual currencies	Prohibited
	Virtual currencies Marijuana	Prohibited Prohibited
70 r		

70 ::	December Comitee December	
70 u	Payment Service Provider	Prohibited
70 v	Other (specify)	Q 70 a, b & h: UBAF core business is trade finance based on correspondent relationship, mostly without account relations and fully covered by KYC process.
71	If restricted, provide details of the restriction	Question 70 i: Restricted transactions as mentioned above are submitted to in-depth analysis on the reliability of the transaction and its stakeholders, the presentation of corroborating documentation authorizing the transfer of goods before applying for the Chief Compliance Officer.
72	Does the Entity perform an additional control or quality review on clients subject to EDD?	Yes
73	Confirm that all responses provided in the above Section KYC, CDD and EDD are representative of all the LE's branches	Yes
73 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to	
73 b	If appropriate, provide any additional information / context to the answers in this section.	Q63: UBAF uses a market tool to retrieve negative news over a period of time through a mass of information collected by the provider, but the search is performed and analyzed manually during the on-boarding and KYC review. Q71i: KYC files of defense activity clients are reviewed every year and transactions escalated.
8. MOI	ITORING & 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?	Combination of automated and manual
76	If manual or combination selected, specify what type of transactions are monitored manually	The Bank performs pre-trade compliance checks triggering red flags to identify suspicious transactions. Even if a trade passes the pre-trade compliance process it can be directed to a post-trade profiling scenario and trigger an alert that will be analyzed by the Compliance Department.
77	Does the Entity have regulatory requirements to report suspicious transactions?	Yes
77 a	If Y, does the Entity have policies, procedures and processes to comply with suspicious transaction reporting requirements?	Yes
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. PAY	MENT 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	Directive (EU) 2015/2366 of the European Parliament and of the Council of 25 November 2015 on payment services in the Internal market, amending Directives 2002/65/EC, 2009/110/EC and 2013/36/EU and Regulation (EU) No 1093/2010, and repealing Directive 2007/64/EC and other local applicable regulations.
81 c	If N, explain	

Does the Entity have processes in place to respond to Request For Indivation (SRIPs) from Yes to Other entities in a timely manner? Yes			
inclusion of required and accurate originator information in international payment messages? 84 Does the Entity have controls to support the inclusion of required beneficially information international payment messages? 85 Confirm that all responses provided in the inclusion of required beneficially information international payment messages? 85 If Notificially the provide any additional information of all the LEs branches 86 If If Notificially the provide any additional information of context to the answers in this section. 86 Does the Entity have a Sanctions Policy approved by management regarding compliance with sanctions taw applicable to the conducted with, or through accounts held all foreign financial institutions? 87 Does the Entity have a Sanctions Policy approved by management regarding compliance with sanctions taw applicable to the conducted with, or through accounts or services in a manner causing the other entity to violate conducted with, or through accounts or services in a manner causing the other entity to violate entity for industry and accounts or services in an institutions? 88 Does the Entity have policies, procedures or other controls reasonably designed to provent the use of another entity is coordinated with in the other entity to violate entity for industry and accounts and accounts or services in an institution of another entity is coordinated with or through existing the other entity to violate entity for industry and accounts or services in a manner causing the other entity to violate entity for industry and entity and the entity of violate entity for industry and entity and the entity and the entity of violate entity for industry and entity and the entity and the entity of violate entity for industry and entity and entities and entity an	(1244)	respond to Request For Information (RFIs) from	Yes
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relate to and the branch/es that this applies to. 85 b		above Section PAYMENT TRANSPARENCY	Yes
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. 90 SANCTIONS 90 Des the Entity have a Sanctions Policy compliance with sanctions lew applicable to the Entity, including with respect its business. 91 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 or location in the use of another entity's accounts or services in a manner causing the other entity of unduring prohibitions applicable to the chief entity of unduring prohibitions within the other entity of the controls reasonably designed to prohibit and/or detect actions taken to evade applicable sanctions prohibitions, such as stipping, or the resubmission and/or masking, of sanctions relevant information in cross border transactions? 91 Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during orbaciding and regularly thereafter signiset Sanctions List (TW) 92 What is the method used by the Entity? 93 Select the Sanctions List used by the Entity? 94 What is the method used by the Entity? 95 What is the method used by the Entity in its sanctions against Sanctions attainst and location information, contained in cross border transactions against Sanctions attainst and location information and the processes: 95 A Consolidated United Nations Security Council Sanctions List (TW) 96 United States Department of the Treasury's Office of Foreign Assets Control (CPAC) 97 Office of Foreign Assets Co	-		
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OF IA/han regulation outbacking make understants	94	Question removed	
their Sanctions list, how many business days before the entity updates their active manual and/or automated screening systems against:	95	before the entity updates their active manual	

95 a	Customer Data	
33 a	Customer Data	Same day to 2 business days
95 b	Transactions	Same day to 2 business 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.	
	If appropriate, provide any additional information / context to the answers in this section.	Q89: The screening method is automated. The matches derive from the automated check are assessed manually. Starting from the on-boarding process checks are performed manually and continue automatically while the KYC file is being completed.
	INING & EDUCATION	
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 с	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.	
12. QU/	ALITY ASSURANCE /COMPLIANCE TES	TING

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.	
13. AUE	DIT	
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
108	Does the internal audit function or other independent third party cover the following areas:	
108 a	AML, CTF & Sanctions policy and procedures	Yes
108 b	KYC / CDD / EDD and underlying methodologies	Yes
108 с	Transaction Monitoring	Yes
108 d	Transaction Screening including for sanctions	Yes
108 e	Name Screening & List Management	Yes
108 f	Training & Education	Yes
108 g	Technology	Yes
108 h	Governance	Yes
108 i	Reporting/Metrics & Management Information	Yes
108 j	Suspicious Activity Filing	Yes
108 k	Enterprise Wide Risk Assessment	Yes
108	Other (specify)	Not applicable as there is no other audit area.
109	Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness?	Yes
110	Confirm that all responses provided in the above section, AUDIT are representative of all the LE's branches	Yes
110 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	U'B'A'F UNION DE BANQUES ARABES ET FRANÇAISES
110 b	If appropriate, provide any additional information / context to the answers in this section.	S.A. CAPITAL 250.727.220 € RCS NANTERRE B 702 027 178 Tour EQHO 2, avenue Gambetta
		L- Défence Cedex

92066 Paris La Défense Cedex Tél.: 33 (0)1 46 40 61 01 - Fax: 33 (0)1 47 38 13 88 www.ubaf.fr CBDDQ V1.3

Declaration Statement

Wolfsberg Group Correspondent Banking Due Diligence Questionnaire 2020 (CBDDQ V1.3)

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)

UNION DE BANQUES ARABES ET FRANCAISES

_ (Financial Institution 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.

The Financial Institution 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.

The Financial Institution recognises the importance of transparency regarding parties to transactions in international payments and has adopted/is committed to adopting these standards.

The Financial Institution 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 thisWolfsberg CBDDQ wjfl be kept current and will be updated no less frequently than on an annual basis.

The Financial Institution commits to file accurate supplemental information on a timely basis.

Jean-Claude GELHAAR \

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 the Financial Institution

Genevieve TABASTE

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 the Financial Institution.

07/03/2022

(Signature & Date)

07/03/2022

(Signature & Date)

S.A. CAPITAL 250 / RCS NANTERRE B 7:

Tour EC:

2, avenue C:

27966 Paris La E

www.u

53 (0)1 46 40 61 01 - I