# Wolfsberg Group Financial Crime Compliance Questionnaire

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| **Financial Institution Name:** | **Uptevia** |
| **Location (Country) :** | **France** |

| No # | Question | Answer |
|---|---|---|
| **1. ENTITY & OWNERSHIP** | | |
| **1** | Full Legal name | Uptevia |
| **2** | Append a list of foreign branches which are covered by this questionnaire | - |
| **3** | Full Legal (Registered) Address | 90 - 110 Esplanade du Général de Gaulle<br>92931 Paris La Défense Cedex<br>France |
| **4** | Full Primary Business Address (if different from above) | - |
| **5** | Date of Entity incorporation/establishment | 25/05/2004 |
| **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 | - |
| **6 c** | Government or State Owned by 25% or more | - |
| **6 d** | Privately Owned | Yes |
| **6 d1** | If Y, provide details of shareholders or ultimate beneficial owners with a holding of 10% or more | 50% BNP Paribas SA ;<br>50 % CACEIS (Groupe CASA) |
| **7** | % of the Entity's total shares composed of bearer shares | 0% |
| **8** | Does the Entity, or any of its branches, operate under an Offshore Banking License (OBL) ? | No |
| **8 a** | If Y, provide the name of the relevant branch/es which operate under an OBL | - |
| **9** | Does the Bank have a Virtual Bank License or provide services only through online channels? | No |
| **10** | Provide Legal Entity Identifier (LEI) if available | 9695009VUMOUXTC7WD85 |
| **2. AML, CTF & SANCTIONS PROGRAMME** | | |
| **11** | Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: | |
| **11 a** | Appointed Officer with sufficient experience/expertise | Yes |
| **11 b** | Adverse Information Screening | Yes |
| **11 c** | Beneficial Ownership | Yes |
| **11 d** | Cash Reporting | Not applicable |
| **11 e** | CDD | Yes |
| **11 f** | EDD | Yes |
| **11 g** | Independent Testing | Yes |

| No # | Question | Answer |
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| **11 h** | Periodic Review | Yes |
| **11 i** | Policies and Procedures | Yes |
| **11 j** | PEP Screening | Yes |
| **11 k** | Risk Assessment | Yes |
| **11 l** | Sanctions | Yes |
| **11 m** | Suspicious Activity Reporting | Yes |
| **11 n** | Training and Education | Yes |
| **11 o** | Transaction Monitoring | Yes |
| **12** | Is the Entity's AML, CTF & Sanctions policy approved at least annually by the Board or equivalent Senior Management Committee? | Yes |
| **13** | Does the Entity use third parties to carry out any components of its AML, CTF & Sanctions programme? | Yes |
| **13 a** | If Y, provide further details | Screening (Sanctions & PEP) outsourced to BNP Paribas SA ; Filtering on Sanctions processed by the Uptevia's bankers (CACIB & BNY-Mellon) |
| **14** | Does the entity have a whistleblower policy? | Yes |
| 3. ANTI BRIBERY & CORRUPTION | | |
| **15** | Has the Entity documented policies and procedures consistent with applicable ABC regulations and requirements to reasonably prevent, detect and report bribery and corruption? | Yes |
| **16** | Does the Entity's internal audit function or other independent third party cover ABC Policies and Procedures? | Yes |
| **17** | Does the Entity provide mandatory ABC training to: | |
| **17 a** | Board and Senior Committee Management | Yes |
| **17 b** | 1st Line of Defence | Yes |
| **17 c** | 2nd Line of Defence | Yes |
| **17 d** | 3rd Line of Defence | Yes |
| **17 e** | Third parties to which specific compliance activities subject to ABC risk have been outsourced | External consultants |
| **17 f** | Non-employed workers as appropriate (contractors/consultants) | Yes |
| 4. AML, CTF & SANCTIONS POLICIES & PROCEDURES | | |
| **18** | Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: | |
| **18 a** | Money laundering | Yes |
| **18 b** | Terrorist financing | Yes |
| **18 c** | Sanctions violations | Yes |
| **19** | Does the Entity have policies and procedures that: | |
| **19 a** | Prohibit the opening and keeping of anonymous and fictitious named accounts | Yes |
| **19 b** | Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs | Yes |
| **19 c** | Prohibit dealing with other entities that provide banking services to unlicensed banks | Yes |

| No # | Question | Answer |
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| **19 d** | Prohibit accounts/relationships with shell banks | Yes |
| **19 e** | Prohibit dealing with another Entity that provides services to shell banks | Yes |
| **19 f** | Prohibit opening and keeping of accounts for Section 311 designated entities | Yes |
| **19 g** | Prohibit opening and keeping of accounts for any of unlicensed/unregulated remittance agents, exchanges houses, *casa de cambio*, *bureaux de change* or money transfer agents | Yes |
| **19 h** | Assess the risks of relationships with domestic and foreign PEPs, including their family and close associates | Yes |
| **19 i** | Define the process for escalating financial crime risk issues/potentially suspicious activity identified by employees | Yes |
| **19 j** | Outline the processes regarding screening for sanctions, PEPs and Adverse Media/Negative News | Yes |
| **20** | Has the Entity defined a risk tolerance statement or similar document which defines a risk boundary around their business? | Yes |
| **21** | Does the Entity have record retention procedures that comply with applicable laws? | No |
| **21 a** | If Y, what is the retention period? | |
| 5. KYC, CDD and EDD | | |
| **22** | Does the Entity verify the identity of the customer? | Yes |
| **23** | Do the Entity's policies and procedures set out when CDD must be completed, e.g. at the time of onboarding or within 30 days? | Yes |
| **24** | Which of the following does the Entity gather and retain when conducting CDD? Select all that apply: | |
| **24 a** | Customer identification | Yes |
| **24 b** | Expected activity | Yes |
| **24 c** | Nature of business/employment | Yes |
| **24 d** | Ownership structure | Yes |
| **24 e** | Product usage | Yes |
| **24 f** | Purpose and nature of relationship | Yes |
| **24 g** | Source of funds | Yes |
| **24 h** | Source of wealth | Yes |
| **25** | Are each of the following identified: | |
| **25 a** | Ultimate beneficial ownership | Yes |
| **25 a1** | Are ultimate beneficial owners verified? | Yes |
| **25 b** | Authorised signatories (where applicable) | Yes |
| **25 c** | Key controllers | Yes |
| **25 d** | Other relevant parties | Yes |
| **26** | Does the due diligence process result in customers receiving a risk classification? | Yes |
| **27** | Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs? | Yes |
| **28** | Does the Entity have policies, procedures and processes to review and escalate potential matches from screening | Yes |

| No # | Question | Answer |
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| | customers and connected parties to determine whether they are PEPs, or controlled by PEPs? | |
| **29** | Is KYC renewed at defined frequencies based on risk rating (Periodic Reviews)? | Yes |
| **29 a** | If yes, select all that apply: | |
| **29 a1** | Less than one year | Yes |
| **29 a2** | 1 – 2 years | Yes |
| **29 a3** | 3 – 4 years | Yes |
| **29 a4** | 5 years or more | Yes |
| **29 a5** | Trigger-based or perpetual monitoring reviews | Yes |
| **29 a6** | Other (please specify) | Perpetual review based on Risk classification (1, 3, 5 years) and trigger-based review |
| **30** | From the list below, which categories of customers or industries are subject to EDD and/or are restricted, or prohibited by the Entity's FCC programme? | |
| **30 a** | Arms, Defence, Military | EDD on a risk based approach |
| **30 b** | Respondent Banks | EDD on a risk based approach |
| **30 b1** | If EDD or EDD & restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022? | Yes |
| **30 c** | Embassies/Consulates | EDD on a risk based approach |
| **30 d** | Extractive industries | EDD on a risk based approach |
| **30 e** | Gambling customers | EDD on a risk based approach |
| **30 f** | General Trading Companies | EDD on a risk based approach |
| **30 g** | Marijuana-related Entities | Prohibited |
| **30 h** | MSB/MVTS customers | Do not have this category of customer or industry |
| **30 i** | Non-account customers | Prohibited |
| **30 j** | Non-Government Organisations | EDD on a risk based approach |
| **30 k** | Non-resident customers | EDD on a risk based approach |
| **30 l** | Nuclear power | EDD on a risk based approach |
| **30 m** | Payment Service Providers | EDD on a risk based approach |
| **30 n** | PEPs | EDD on a risk based approach |
| **30 o** | PEP Close Associates | EDD on a risk based approach |
| **30 p** | PEP Related | EDD on a risk based approach |
| **30 q** | Precious metals and stones | EDD on a risk based approach |
| **30 r** | Red light businesses/Adult entertainment | Prohibited |
| **30 s** | Regulated charities | EDD on a risk based approach |
| **30 t** | Shell banks | Prohibited |
| **30 u** | Travel and Tour Companies | EDD on a risk based approach |
| **30 v** | Unregulated charities | EDD on a risk based approach |
| **30 w** | Used Car Dealers | Do not have this category of customer or industry |
| **30 x** | Virtual Asset Service Providers | Prohibited |
| **30 y** | Other (specify) | Not Applicable |
| **31** | If restricted, provide details of the restriction | Not Applicable |

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| No # | Question | Answer |
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| **6. MONITORING & REPORTING** | | |
| **32** | Does the Entity have risk based policies, procedures and monitoring processes for the identification and reporting of suspicious activity? | Yes |
| **33** | What is the method used by the Entity to monitor transactions for suspicious activities? | Automated |
| **33 a** | If manual or combination selected, specify what type of transactions are monitored manually | Not Applicable |
| **34** | Does the Entity have regulatory requirements to report suspicious transactions? | Yes |
| **34 a** | If Y, does the Entity have policies, procedures and processes to comply with suspicious transactions reporting requirements? | Yes |
| **35** | Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity? | Yes |
| **7. PAYMENT TRANSPARENCY** | | |
| **36** | Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards? | No |
| **37** | Does the Entity have policies, procedures and processes to comply with and have controls in place to ensure compliance with: | |
| **37 a** | FATF Recommendation 16 | Yes |
| **37 b** | Local Regulations | Yes |
| **37 b1** | If Y, Specify the regulation | Regulation (EU) 2015/847 of the European Parliament and of the Council of May 2016 on information accompanying transfers of funds and repealing Regulation (EC) N°1781/2006. |
| **37 c** | If N, explain | |
| **8. SANCTIONS** | | |
| 38 | Does the Entity have a Sanctions Policy approved by management regarding compliance with sanctions law applicable to the Entity, including with respect to its business conducted with, or through accounts held at foreign financial institutions? | Yes |
| **39** | Does the Entity have policies, procedures or other controls reasonably designed to prohibit and/or detect actions taken to evade applicable sanctions prohibitions, such as stripping, or the resubmission and/or masking, of sanctions relevant information in cross border transactions? | Yes |
| **40** | Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists? | Yes |
| **41** | Select the Sanctions Lists used by the Entity in its sanctions screening processes: | |

| No # | Question | Answer |
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| **41 a** | Consolidated United Nations Security Council Sanctions List (UN) | Used for screening customers and beneficial owners (i.e. reference data) |
| **41 b** | United States Department of the Treasury's Office of Foreign Assets Control (OFAC) | Used for screening customers and beneficial owners (i.e. reference data) |
| **41 c** | Office of Financial Sanctions Implementation HMT (OFSI) | Used for screening customers and beneficial owners (i.e. reference data) |
| **41 d** | European Union Consolidated List (EU) | Used for screening customers and beneficial owners (i.e. reference data) |
| **41 e** | Lists maintained by other G7 member countries | Used for screening customers and beneficial owners (i.e. reference data) |
| **41 f** | Other (specify) | |
| **42** | Does the Entity have a physical presence, e.g. branches, subsidiaries, or representative offices located in countries/regions against which UN, OFAC, OFSI, EU or G7 member countries have enacted comprehensive jurisdiction-based Sanctions? | No |
| 9. TRAINING & EDUCATION | | |
| **43** | Does the Entity provide mandatory training, which includes: | |
| **43 a** | Identification and reporting of transactions to government authorities | Yes |
| **43 b** | Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered | Yes |
| **43 c** | Internal policies for controlling money laundering, terrorist financing and sanctions violations | Yes |
| **43 d** | New issues that occur in the market, e.g. significant regulatory actions or new regulations | Yes |
| **44** | Is the above mandatory training provided to : | |
| **44 a** | Board and Senior Committee Management | Yes |
| **44 b** | 1st Line of Defence | Yes |
| **44 c** | 2nd Line of Defence | Yes |
| **44 d** | 3rd Line of Defence | Yes |
| **44 e** | Third parties to which specific FCC activities have been outsourced | External consultants |
| **44 f** | Non-employed workers (contractors/consultants) | Yes |
| 10. AUDIT | | |
| **45** | In addition to inspections by the government supervisors/regulators, does the Entity have an internal audit function, a testing function or other independent third party, or both, that assesses FCC AML, CTF, ABC, Fraud and Sanctions policies and practices on a regular basis? | Yes |

**Signature Page**

Wolfsberg Group Financial Crime Compliance Questionnaire 2023 (FCCQ V1.2)

**Uptevia _____(Financial Institution name)**
**I, Joël PIGEON ___(Senior Compliance Manager- Second Line representative), certify that I have read and understood this declaration, that the answers provided in this Wolfsberg FCCQ are complete and correct to my honest belief.**



**03/06/2026**
**(Signature & Date)**