



16, boulevard des Italiens

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France

Paris, October 19th, 2021

Subject: BNP Paribas Group Financial Security and Anti Bribery & Corruption Program

BNP Paribas ("BNPP" or "the Bank") is a French global financial institution headquartered in Paris, France. The Bank is supervised on a consolidated basis by the *Autorité de Contrôle Prudentiel et de Résolution* and the European Central Bank. BNPP, including its branches and subsidiaries in France and abroad ("BNPP Group") is firmly committed to economic sanctions compliance and to combatting money laundering, the financing of terrorism, corruption (together "Financial Security") and tax evasion.¹

As part of these efforts, BNPP Group has adopted and maintains a global risk-based compliance program (the "Financial Security Program") reasonably designed to comply with applicable anti-money laundering, anti-corruption, countering the financing of terrorism, and Sanctions² laws, rules and regulations in the territories where the Group operates. Significant resources and personnel are dedicated to this end, notably within an integrated Compliance Function.

The Group has established a Financial Security Program consisting of the following elements: (i) written policies, procedures, systems and internal controls designed to comply with applicable financial security rules, laws, and regulations, (ii) dedicated personnel responsible for the implementation and operation of the Financial Security Program, (iii) independent testing and audit, (iv) an ongoing training program and (v) reporting and record keeping, all of which are informed by the best international practices. The Bank's Financial Security Program includes:

- A Know Your Customer program reasonably designed to identify, verify and update the identity of its customers, including, where applicable, their respective beneficial owners³ and proxy holders;

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- 1) BNPP Group is not: (i) a "Shell bank"; (ii) the target of Sanctions, or (iii) targeted under Section 311 of the USA PATRIOT Act. "Shell bank" means a bank that has no physical presence in the country in which it is incorporated and licensed, and which is unaffiliated with a regulated financial group that is subject to effective consolidated supervision. "Section 311 of the USA PATRIOT Act" refers to the individuals or entities listed pursuant to Section 311 of the U.S.A. Patriot Act (http://www.fincen.gov/statutes_regs/patriot/section311.html) as well as entities beneficially owned or controlled by such persons.
 - 2) "Sanctions" means any economic or trade sanctions, including associated laws, regulations, restrictive measures, embargoes, and asset freezing measures, that are enacted, administered, imposed, or enforced by the French Republic, the European Union, the U.S. Department of the Treasury's Office of Foreign Assets Control, and any other competent authority in territories where BNPP Group is located, organized, or resident.
 - 3) Beneficial owner refers to:
 - the natural person(s) who ultimately (i.e. including through a chain of ownership) owns 25% or more of the shares or voting rights of a customer or controls a customer; and/or
 - the natural person(s) on whose behalf a transaction or an activity is being conducted.

- Enhanced due diligence for high-risk clients, politically exposed persons, and situations of increased risk;
- Written policies, procedures and controls reasonably designed to ensure that it does not establish or maintain relationships with Shell banks;
- A policy, based on the internal assessment of risks and of the economic situation, to generally not process or otherwise engage, regardless of the currency, in activity or business:
 - for, on behalf of, or for the benefit of any individual, entity or organization targeted by the French, European Union or United States sanctions authorities, as well as by the United Nations or in certain cases, other local sanctions in territories where the Group operates
 - involving directly or indirectly sanctioned territories including Crimea/Sevastopol, Cuba, Iran, North Korea, or Syria;
 - involving financial institutions or territories which could be connected to or controlled by terrorist organisations, recognized as such by the relevant authorities in France, the European Union, the U.S and the United Nations;
- Customer database screening and transaction filtering reasonably designed to ensure compliance with applicable laws;
- Systems and processes designed to detect and report suspicious activity to the relevant regulatory authorities;
- A compliance program reasonably designed to prevent and detect bribery, corruption and unlawful influence in compliance with the French Sapin II Law, the U.S. FCPA and the UK Bribery Act.



Nathalie HARTMANN,
Head of Compliance

Previous versions:

- July 12, 2016
- December 21, 2016
- May 3rd, 2018
- October 16th, 2019