



Financial Institution Name:

SOCIETE GENERALE

Location (Country) :


France

No #	Question	Answer
1. ENTITY & OWNERSHIP		
1	Full Legal name	SOCIETE GENERALE
2	Append a list of foreign branches which are covered by this questionnaire (if applicable)	Please refer to the 2023 list of branches in appendix
3	Full Legal (Registered) Address	29 Boulevard Haussmann 75009 Paris - France
4	Full Primary Business Address (if different from above)	17 cours Valmy 92972 Paris-La Défense cedex - France
5	Date of Entity incorporation/establishment	May 4, 1864
6	Select type of ownership and append an ownership chart if available	
6 a	Publicly Traded (25% of shares publicly traded)	Yes
6 a1	If Y, indicate the exchange traded on and ticker symbol	Bourse de Paris - Euronext Paris - GLE
6 b	Member Owned/Mutual	No
6 c	Government or State Owned by 25% or more	No
6 d	Privately Owned	No
6 d1	If Y, provide details of shareholders or ultimate beneficial owners with a holding of 10% or more	
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) ?	Yes
8 a	If Y, provide the name of the relevant branch/es which operate under an OBL	SOCIETE GENERALE, GRAND CAYMAN BRANCH
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	O2RNE8IBXP4R0TD8PU41
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	Yes
11 e	CDD	Yes
11 f	EDD	Yes
11 g	Independent Testing	Yes
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	We use third parties located in India, Romania and Poland to carry out some of our AML-CTF-Sanctions functions but these providers are an integral part of SG Group. We may also use external providers to manage KYC documentation collection, verification and scanning -but KYC files are systematically validated within SG Group
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	Not Applicable
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
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?	Yes
21 a	If Y, what is the retention period?	5 years or more
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 customers and connected parties to determine whether they are PEPs, or controlled by PEPs?	Yes
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	No
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)	
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	Restricted
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	Restricted
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	EDD on a risk based approach
30 i	Non-account customers	Do not have this category of customer or industry
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	Restricted
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	Restricted
30 r	Red light businesses/Adult entertainment	EDD on a risk based approach
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	EDD on a risk based approach
30 x	Virtual Asset Service Providers	Always subject to EDD
30 y	Other (specify)	https://www.societegenerale.com/en/responsability/csr-ambition/csr-commitments https://www.societegenerale.com/sites/default/files/documents/2021-03/Environmental-and-Social-General-Principles.pdf
31	If restricted, provide details of the restriction	https://www.societegenerale.com/en/responsability/ethics-and-governance

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?	Combination of automated and manual
33 a	If manual or combination selected, specify what type of transactions are monitored manually	The monitoring of transactions for suspicious activities is automated. On top of this, human monitoring is used to identify the suspicious transactions. All trade finance transactions are checked pre trade via manual monitoring. For some high risk activities subject to enhanced account monitoring, additional checks are performed on top of automated monitoring.
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?	Yes
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	Such as: EU regulation 2015-847. US (Travel Rules), Japan, Switzerland, Turkey, Korea, India, Singapore (MAS Guidance) and Taiwan regulations.
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:	
41 a	Consolidated United Nations Security Council Sanctions List (UN)	Used for screening customers and beneficial owners and for filtering transactional data
41 b	United States Department of the Treasury's Office of Foreign Assets Control (OFAC)	Used for screening customers and beneficial owners and for filtering transactional data
41 c	Office of Financial Sanctions Implementation HMT (OFSI)	Used for screening customers and beneficial owners and for filtering transactional data
41 d	European Union Consolidated List (EU)	Used for screening customers and beneficial owners and for filtering transactional data
41 e	Lists maintained by other G7 member countries	Used for screening customers and beneficial owners and for filtering transactional data
41 f	Other (specify)	Any other local list as it may be required by relevant local regulations, such as: Belgium, Canada, Hong Kong, Japan, Netherlands, South Korea, Switzerland, UAE, UK. In addition, the bank applies sanctioned securities list to transaction and referential screening

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	Yes
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
<p>Signature Page</p> <p>Wolfsberg Group Financial Crime Compliance Questionnaire 2023 (FCCQ V1.2)</p> <p>_____ SOCIETE GENERALE _____ (Financial Institution name)</p> <p>I, <u>Grégoire SIMON BARBOUX</u> (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.</p> <p> 04182023 _____ (Signature & Date)</p>		

Country	Town / Location	Name	Branch Address	Local Regulator	Date of Incorporation / establishment
AUSTRALIA	SYDNEY	SOCIETE GENERALE	1-7 Blich Street Sydney NSW 2000 AUSTRALIA	Australian Prudential Regulation Authority (APRA)	16/05/2019
AUSTRIA	VIENNA	SOCIETE GENERALE	Prinz-Eugen-Strasse 8-10/5/11 - A 1040 VIENNA AUSTRIA	Austrian Financial Market Authority (Österreichische Finanzmarktaufsicht - FMA)	21/08/1998
BELGIUM	BRUXELLES	SOCIETE GENERALE	Atrium Building, Rue des Colonies 11, 4th Floor, 1000 BRUXELLES BELGIUM	Financial Services and Market Authority (FSMA)	31/12/1995
CANADA	MONTREAL	SOCIETE GENERALE	1501 McGill College Suite 1800 H3A 3M8 - Montréal QUEBEC CANADA	Office of the Superintendent of Financial Institutions (OSFI)	19/12/2005
CAYMAN ISLANDS	GRAND CAYMAN	SOCIETE GENERALE	c/o Cainvest Bank and Trust Limited Harbour Place, 5th Floor, 103 South Church Street, KY1 1108 George Town, CAYMAN ISLANDS (P.O. Box 1353GT, Grand Cayman, KY1-1106)	Cayman Islands Monetary Authority (CIMA)	01/01/1979
GERMANY	FRANKFURT	SOCIETE GENERALE	Neue Mainzer Strasse 46-50, 60311 FRANKFURT AM MAIN GERMANY	Federal Financial Supervisory Authority (Bundesanstalt für Finanzdienstleistungsaufsicht - BaFin)	01/09/1977
HONG KONG	HONG KONG	SOCIETE GENERALE	Level 38, Three Pacific Place, 1 Queen's Road East, HONG KONG	Hong Kong Monetary Authority SFC - Securities & Futures Commission	25/07/1978
INDIA	MUMBAI	SOCIETE GENERALE	Peninsula Business park, 19th floor, tower A, Ganpat Rao Kadam Marg, Lower Parel, MUMBAI 400013 INDIA	Reserve Bank of India	15/04/1985
IRELAND	DUBLIN	SOCIETE GENERALE	3rd floor, IFSC House International Financial Services Center DUBLIN 1, IRELAND	Central Bank of Ireland	05/11/1999
ITALY	MILAN	SOCIETE GENERALE	Via Olona, 2 20123 MILANO ITALY	Banca D'Italia - Bank of Italy	31/12/1980
JAPAN	TOKYO	SOCIETE GENERALE	Palace Building, 1-1-1 Marunouchi, Chiyoda-ku, TOKYO 100-8206 JAPAN	Financial Services Agency (FSA)	11/06/1973
MONACO	MONACO	SOCIETE GENERALE	16 Avenue de la Costa Palais de la Scala - BP 249 MC 98007 MONACO CEDEX	Autorité de Contrôle Prudentiel et de Résolution (ACPR - France)	28/06/1962
NETHERLANDS	AMSTERDAM	SOCIETE GENERALE	Amstelplein 1 « Rembrandt Tower » 1096 HA AMSTERDAM NETHERLANDS	De Nederlandsche Bank - Dutch Central Bank (DNB) Netherlands Authority for the Financial Markets (AFM)	11/07/1977
POLAND	WARSAW	SOCIETE GENERALE	Oddział w Polsce ul. Marszałkowska 111 00-102 Warsaw POLAND	Komisja Nadzoru Finansowego - Polish Financial Supervision Authority	01/01/1992
SINGAPORE	SINGAPORE	SOCIETE GENERALE	8 Marina Boulevard #12-01 Marina Bay Financial Centre Tower 1 SINGAPORE 018981	Monetary Authority of Singapore (MAS)	28/12/1978
SOUTH AFRICA	JOHANNESBURG	SOCIETE GENERALE	2ND FLOOR 160 Jan Smuts Avenue, Rosebank 2196 - PO Box 6872 JOHANNESBURG 2000 SOUTH AFRICA	South African Reserve Bank (SARB)	21/05/1996
SOUTH KOREA	SEOUL	SOCIETE GENERALE	23rd Floor, D1 D-Tower, 17 Jong-ro 3-gil, Jongnogu, 03155 SEOUL, SOUTH KOREA	Financial Supervisory Service	01/12/1983
SPAIN	MADRID	SOCIETE GENERALE	Torre Picasso, 1 Plaza Pablo Ruiz Picasso 28020 MADRID SPAIN	Banco de España - Bank of Spain	31/05/1991
SWEDEN	STOCKHOLM	SOCIETE GENERALE	7 Nybrokajen, 8th floor SE 111 48 Stockholm, SWEDEN	Finansinspektionen (FI)	15/11/2017
SWITZERLAND	ZURICH	SOCIETE GENERALE	Talacker 50, Case Postale 1928, CH-8021, ZURICH SWITZERLAND	Swiss Financial Market Supervisory Authority (FINMA)	01/07/1999
TAIWAN	TAIPEI	SOCIETE GENERALE	Taiwan 38F, No. 68, Section 5, Zhongxiao East Road, Xinyi District, Taipei City 110, TAIWAN	Financial Supervisory Commission and Central Bank of the Republic of China (Taiwan)	25/09/1980
TURKEY	ISTANBUL	SOCIETE GENERALE	Nispetiye Caddesi Akmerkez E-3 Blok Kat 10 80600 ISTANBUL TURKEY	Bankacilik Düzenleme ve Denetleme Kurumu (Banking Regulation and Supervision Agency - BRSA) Central Bank of the Republic of Turkey Capital Market Board	01/06/1990
UNITED ARAB EMIRATES	Dubai International Financial Center (DIFC)	SOCIETE GENERALE	Societe Generale DIFC Branch (Middle East) Dubai International Financial Center (DIFC), The Gate Village, Building 6, Dubai, UAE PO Box 29600	Dubai Financial Services Authority (DFSA)	02/12/2007
UNITED KINGDOM	LONDON	SOCIETE GENERALE	One Bank Street, Canary Wharf London, E14 4SG UK	Financial Conduct Authority (FCA)	01/01/1871
UNITED STATES OF AMERICA	NEW YORK	SOCIETE GENERALE	245 Park Avenue NEW YORK, NY 10167 USA	New York State Department of Financial Services (NYS) Federal Reserve	01/12/1982
	CHICAGO	SOCIETE GENERALE	425 S Financial Place, Chicago, IL 60605 USA	New York State Department of Financial Services (NYS) Federal Reserve	28/10/1981