



## Presentation of BNP Paribas's Global Know Your Client, Intermediary and Supplier framework (published in March 2022)

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.

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 Sanctions<sup>1</sup> laws, rules and regulations in the territories where the Group operates<sup>2</sup>. 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 relies notably on a global Know Your Client policy (the "Global KYC Policy"), a global Know Your Intermediary policy (the "Global KYI Policy") and a global Know Your Supplier policy (the "Global KYS Policy") applicable to the BNPP Group.

The Global KYC Policy includes:

- Identifying, verifying and updating the identity of its customers
- Identifying the beneficial owner and taking reasonable measures to verify the identity of the beneficial owner and update it. For legal persons this includes the ownership and control structure of the customer;
- Understanding and, where appropriate, obtaining information on the purpose and intended nature of the business relationship;
- Conducting ongoing due diligence on the business relationship and scrutiny of transactions undertaken throughout the course of the relationship to ensure that the transactions conducted are consistent with the Bank's knowledge of the customer, their business and risk profile, including, where necessary, the source of funds;
- Enhanced due diligence for high-risk clients, politically exposed persons, and situations of increased risk, both at onboarding and during the relationship.

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<sup>1</sup> "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.

<sup>2</sup> A document describing the BNP Paribas' Financial Security and Anti-Bribery and Corruption Program can be found on our website at [https://group.bnpparibas/uploads/file/summary\\_updated\\_abc\\_policy\\_legal\\_edits\\_002.pdf](https://group.bnpparibas/uploads/file/summary_updated_abc_policy_legal_edits_002.pdf)



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The Global KYC Policy specifies the information to collect and analyze for each type of clients (private individuals, corporate, financial institutions, public entities, etc.) and the methodology used to determine the extent of such diligences using a risk-based approach in accordance with applicable regulation and the FATF Recommendations. It also defines the role of the various teams involved on the KYC process, from data collection to controls of compliance of internal procedures.

The global KYI and KYS Policies-defines similar diligences to conduct on intermediaries and suppliers.

Collection and processing of personal data comply with applicable Privacy Rules and data protection regulations.

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