



Presentation of BNP Paribas's Global Know Your Client, Intermediary and Supplier framework

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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 Sanctions¹ laws, rules and regulations in the territories where the Group operates². 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 Know Your Intermediary policy (the "KYI Policy"), a Know Your Supplier policy (the "KYS Policy") and a Know Your X policy (the "KYX Policy") applicable to the BNPP Group.

In addition to Financial Security related risks, these policies help the Bank assessing and managing other risks related to its relationship with third parties such as Market Integrity, Protection of the interests of the client, Reputational and ESG risks.

The Global KYC Policy, that is regularly updated, 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;
- Identifying other related persons such as Senior Managing Officials, Directors and any persons acting on behalf of the client;
- Understanding and, where appropriate, obtaining information on the purpose and intended nature of the business relationship;

¹ "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.

² 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



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- 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, correspondent banking, and situations of increased risk (residence in a High Risk Third Country, exposure to corruption risk etc.), both at onboarding and during the relationship.

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

The KYI, KYS and KYX Policies define similar diligences to conduct, following a risk-based approach, on intermediaries, suppliers and other parties that are not clients, intermediaries, or suppliers (e.g., beneficiaries of donations, participants in trade finance and cash management transactions etc.)

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