## VIRTUAL ASSET SERVICE

**PROVIDER QUESTIONNAIRE**

The personal data collected in this document by Société Générale, in its capacity as data controller, is mandatory in order to comply with its applicable legal and regulatory obligations, in particular regarding international regulations concerning embargoes and economic sanctions, the fight against money laundering and the financing of terrorism, including obligations regarding customer identification, verification and knowledge.

By signing this questionnaire, you acknowledge that this questionnaire may be shared within the Société Générale Group for the purpose of compliance with AML/CFT obligations. Société Générale has taken all necessary measures to protect the confidentiality of the information provided in this questionnaire.

For more information about the exercise of your rights and protection of your data, please refer to our data protection policy available on the Société Générale website of the country in which you wish to enter into a relationship/become customer.

**This questionnaire must be imperatively updated annually/once a year.**

* Full Legal Name [[1]](#footnote-2) : Click or tape here to enter text
* Full head quarter address (registered): Click or tape here to enter text
* Full address of the establishment where the main activities are carried out (if different from above): Click or tape here to enter text
* Address of permanent establishments abroad/other jurisdiction (if applicable): Click or tape here to enter text
* Date of Entity incorporation/ establishment: Click or tape here to enter a date
* Registration number: Click or tape here to enter text
* Are your financial accounts certified by an independent auditor? Yes – No
* **If yes:** by which company? Click or tape here to enter text
* Has your AML/CTF[[2]](#footnote-3) framework been audited by an external audit firm? Yes – No
* **If yes:** when and by which firm was the last audited carried out? Click or tape here to enter text

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| **PART I - REGULATORY STATUS** |
| **I.a. - Are you registered or licensed for the provision of virtual asset services?**  Yes  No   * **If Yes:**    + - Which regulatory authority has delivered the license/registration? Click or tape here to enter text     - What type of authorization or exemption do you have? Click or tape here to enter text     - Please provide the registration/license number: Click or tape here to enter text     - Registration/license date: Click or tape here to enter a date     - Geographical areas of authorized activities: Click or tape here to enter text     - Services registered/licensed *(select the relevant activities):*   - Services related to crypto-assets Issuance and distribution:  Any service which implies the participation in, and provision of financial services related to an issuer’s offer and/or sale of (a) virtual asset(s) (*please insert details*): Click or tape here to enter text  Digital asset placement services  Virtual asset underwriting  Distribution: initial offering of crypto assets (ICO = initial coin offering)  - Trading:  Operating a virtual asset trading (purchase/sale) platform  Advanced trading services (trading on margin, algorithm-based trading)  Reception and transmission of orders (RTO) on virtual assets  Execution of orders for crypto assets on behalf of third parties  OTC[[3]](#footnote-4) services, facilitating trade taking place outside a formal trading venue  P2P matching or connecting services  Market-making, providing liquidity to the market by buying and selling crypto-assets  Exchange between virtual assets and fiat currencies  Exchange between (one or more forms of) virtual assets  Exchange of crypto assets for financial instruments  - Other services :  Crypto-asset lending  Safekeeping and/or administration of virtual assets or instruments enabling control over virtual assets (e.g., custody of crypto keys) on behalf of third parties  Escrow services  Any service which implies the transfer of virtual assets from one address or account to another on behalf of another natural or legal person (as per FATF definition of transfer) (*please insert details*): Click or tape here to enter text  Provider of kiosks (crypto-assets ATM - Vending machines allowing the purchase/sale of digital assets)  Financial advice to virtual assets subscribers  Virtual assets portfolio management  Savings services  - Other activities:  Providing operational and administrative services (asset servicing such as interest and dividend payment, security transactions)  Providing insurance service related to virtual assets (please provide details): Click or tape here to enter text  Other (*please insert details*): Click or tape here to enter text  Attach related documentation (copy of the certificate of registration/license by the relevant regulatory authority and, if possible, copy of application file for registration/license)   * + **If no**, please explain: Click or tape here to enter text   **I.b. – Has your registration or license for the provision of services on digital assets been granted subject to compliance with certain conditions or requests for improvement or recommendations?**  Yes  No   * **If yes,** please specify what conditions, whether they have been met and since when. If they are in the process of being resolved, please specify the actions in progress to remedy and meet these conditions and the deadline: Click or tape here to enter text   **I.c. – Are you, or have you been, subject to controls by competent regulatory authorities?**  Yes  No   * **If yes,** what are the main conclusions of the control mission if available? Click or tape here to enter text   **I.d. – Have you been granted any other registrations/licenses** (e.g., credit institution, payment service provider -PSP-, etc.) **by the competent regulatory/authorities?**  Yes  No   * **If yes,** specify name/type of license/registration, date and authority/regulator:Click or tape here to enter text   Attach related documentation (copy of the certificate of registration/license by the relevant regulatory authority) |

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| **PART II – ACTIVITIES** |
| **II.a. – Which type(s) of virtual asset services do you offer to your customers?**  Only those for which you are regulated/licensed[[4]](#footnote-5) as describe above  Services related to the “Decentralized Finance "DEFI", (Staking, Lending, other: Click or tape here to enter text ….)  Others (*please insert details):* Click or tape here to enter text  **II.b.** **– Detailed description of your business model, services/activities authorized under your registration/license and/ or other activities carried out so that Societe Generale can understand how digital asset activities fit into the overall business model. (If applicable, attach any relevant prospectus):**  Click or tape here to enter text  **II.c. – Your COLD and HOT wallet offer – Do you offer access to cold wallet[[5]](#footnote-6)?**  Yes  No  **II.d - Do you offer custodial[[6]](#footnote-7), non-custodial services[[7]](#footnote-8) or both?** Click or tape here to enter text  **II.e - For custodial wallet services:**   * How do you manage private keys? Click or tape here to enter text * How are signed the transactions? Click or tape here to enter text * Do they require only one signature or several signatures? Please insert details. Click or tape here to enter text   **II.f – Has there been any change during the last calendar year in your business model regarding the virtual asset services you provide? Or other related services?**  Yes  No   * **If yes,** please describe these changes: Click or tape here to enter text * **If not,** specify if you plan to expand your service offering – if so, which ones and when? Click or tape here to enter text   **II.g. – What type(s) and form(s) of virtual assets (e.g., utility tokens, asset-referenced-tokens, e-money tokens, security tokens, cryptocurrency, stablecoins, etc.) and other assets (e.g., electronic money, financial instruments) are involved in your business?**  Click or tape here to enter text   * Can you provide us with a list of the assets offered with the proportion to their use?   Click or tape here to enter text   * What is the geographic breakdown of your digital asset services activities (specify business sectors and number of clients by geographic area)?   Click or tape here to enter text  **II.h. – Do you accept, use, offer or exchange digital assets that promote anonymity, such as cryptocurrencies with enhanced anonymity, also known as Anonymity-Enhanced Crypto Currency (AEC) or privacy coins[[8]](#footnote-9)?**  Yes  No     * **If yes :**   + Specify the name(s) of those anonymity-enhanced virtual assets: Click or tape here to enter text   + How do you accept, use, offer or exchange those assets? Click or tape here to enter text   + In what proportion (by value) Click or tape here to enter text   + What is the geographical distribution of this use? (In value) Click or tape here to enter text * Do you limit the use of digital assets with enhanced anonymity? (Specify: ceilings/geographies/types of customers) Click or tape here to enter text * How do you assess the risk associated with these assets? Click or tape here to enter text * Do you implement specific due diligences when you are required to carry out operations involving this type of asset? Yes No   If yes, precise: Click or tape here to enter text   * Do you systematically perform a reinforced review when you carry out a transaction related to privacy coins or Anonymity-Enhanced Cryptocurrencies (AEC)? Yes No * Does this reinforced review allow you to identify the origin of the funds? Click or tape here to enter text   **II.i. – Do you accept, authorize funds from or going to mixers, tumblers, privacy wallet[[9]](#footnote-10) or other tools for concealing[[10]](#footnote-11) details of transactions or anonymization?**  Yes  No   * **If Yes :** * How do you identify this type of transaction? Click or tape here to enter text * How do you ensure the constant vigilance of these transactions? Click or tape here to enter text * What is the proportion of these transactions in your business? Click or tape here to enter text * What is the geographical breakdown of this use? (Please specify the nature of the clientele and the number of customers by geographical area) Click or tape here to enter text * Indicate the name(s) of the mixing/tumbling tools or other protocols used: Click or tape here to enter text   **II.j. – Do you use an omnibus[[11]](#footnote-12) wallet/account for the custody of the virtual assets involved in your business?**  Yes  No   * **If Yes** : * Are all your transactions clearly identifiable per customer? Yes No * How do you segregate the virtual assets between your customers? Click or tape here to enter text   + Do you keep records off chain? Yes No   **II.k. – Do you have or operate crypto-asset ATM[[12]](#footnote-13) vending machines (kiosks/vending machines)?**  Yes  No   * **If yes,** what is the number and geographical locations of your crypto-asset ATM (kiosks)? Click or tape here to enter text   **II.l. – Do you offer/propose bank cards or their equivalent?**  Yes  No   * **If Yes,**    + Do they offer the option of directly credit/debit the fiat currency account or the crypto-asset wallet? Click or tape here to enter text   + Are these cards offered to all your customers? **If not,** what is the target? Click or tape here to enter text   **II.m. – What types of customers do you have? For each type, please specify the proportion/distribution by customer type (percentage breakdown):**  Individuals : Click or tape here to enter text  Corporates : Click or tape here to enter text  Banks : Click or tape here to enter text  Non-Bank financial institutions (excluding VASP) : Click or tape here to enter text  VASP : Click or tape here to enter text  Public bodies/authorities  : Click or tape here to enter text  Investments funds : Click or tape here to enter text  Non-profit organizations : Click or tape here to enter text  Trusts: Click or tape here to enter text  Suppliers (Financial Service Provider): Click or tape here to enter text  Others (*please specify*): Click or tape here to enter text  **II.n. – In which countries are your customers located** (*provide a list of countries with the applicable customer percentage starting by the five biggest*)**?** Click or tape here to enter text  **II.o. – Do you use the services of any third party to develop your business, such as business introducers, distributors, etc.?**  Yes  No   * **If yes**, specify the name(s) and type(s) of intermediary(ies) and the importance of the activities carried out through them (percentage of business relationships): Click or tape here to enter text   **II.p. – Do you use third-party services to conduct your business, such as active Crypto asset custody services or others?**  Yes  No   * **If yes**, indicate the name(s) and type(s) of provider(s) and the importance ofusing their services (e.g., do you delegate 100% or part of your crypto assets to a custodian provider?):Click or tape here to enter text |

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| **PART III – BANKING FLOWS** |
| **Note: questions III.a. to III.d. to be answered only in case the onboarding involves the opening of a bank account with the Societe Generale Group**  **III.a. – What would you use the bank(s) account(s) for?** (*Specify for which type of payments and the number of flows expected*)  Operating account (transactions/flows relating to the operation of the VASP, e.g., payment of salaries, payment of supplier fees etx.): Click or tape here to enter text  Activity account[[13]](#footnote-14) (transactions/flows relating to VASP customers): Click or tape here to enter text  Trading account (for own account): Click or tape here to enter text  Reserve account[[14]](#footnote-15) (collateral): Click or tape here to enter text  Escrow account[[15]](#footnote-16): Click or tape here to enter text  Other (*specify* and describe): Click or tape here to enter text  **III.b. - What types of flows will be used to fund the bank account(s) opened in Societe Generale’s books?**  **(this concerns the source of crypto-assets prior to their conversion, or, where applicable, the supply of legal tender funds – FIAT)**  Funds from the conversion of digital assets into FIAT currencies  Funds from other foreign VASPs  Funds from other unregulated VASPs (regardless of location)  Funds from the DEFI  Other origin (specify): Click or tape here to enter text  **III.c. Specify the destination of the funds held in the bank account(s) opened in Société Générale’s books :**  To convert FIAT currencies into digital assets  To other foreign VASP  To other unregulated VASPs (regardless of their location)  To the DEFI  Other destination (specify): Click or tape here to enter text  **Provide asset flow diagrams as submitted to the regulator when you apply for registration/license.**  **III.d. On request, are you able to provide us with your public keys and wallet addresses for the digital assets you use in your business?**  Yes  No |

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| **PART IV – FINANCIAL CRIME COMPLIANCE FRAMEWORK** |
| **For each of the following questions, attach the related documentation if any** (description of financial crime program, processes, and controls – potentially included in the license/registration application files or in any independent testing results obtained as part of a certification process, internal control or audit, etc.)  **If an answer is “No”, please provide an appropriate explanation int the “Remarks” section.**   |  |  |  |  |  | | --- | --- | --- | --- | --- | | **Items** | | **Yes** | **No[[16]](#footnote-17)** | **Remarks** | | 1. **FINANCIAL CRIME PROGRAMME** | | | | | | **IV.1.a.** | Have you appointed a compliance officer in charge of ‘*know your customer*’ (KYC), anti-money laundering (AML), counter terrorism financing (CFT) and Sanctions matters with sufficient experience/expertise?  Does he have sufficient knowledge and skills to perform his duties in such a way as to be able to understand the main risks to which the virtual asset service provider is exposed and to comply with the requirements applicable to him in terms of AML-CFT ?  Specify the relevant professional training received, professional experience, nature and duration of the professional functions held. |  |  | Click or tape here to enter text | | **IV.1.b.** | Is he/she in charge of anti-bribery and corruption (ABC[[17]](#footnote-18)) topics? |  |  | Click or tape here to enter text | | **IV.1.c.** | How many full-time employees work in the Financial Crime Compliance Department? | Click or tape here to enter text | | | | **IV.1.d.** | Do you use third parties to carry out any components of your Financial Crime Compliance program? |  |  | Click or tape here to enter text | | **IV.1.e.** | Is your compliance officer(s)/AMLRO (Anti-Money Laundering Reporting Officer) in direct contact with the Financial Intelligence Unit (FIU)[[18]](#footnote-19) in your location? |  |  | Click or tape here to enter text | | **IV.1. f.** | **If yes,** is he/she authorized to and required to report to the FIU situations where he/she suspects or has reasonable grounds to suspect that the funds in question originate from criminal activity, or are linked to terrorist financing? |  |  | Click or tape here to enter text | | **IV.1.g.** | Do you have training programs covering AML/CFT, Sanctions and ABC risks? |  |  | Click or tape here to enter text | | Are the programs mandatory to all your employees? Indicate how often these training programs are rolled out. |  |  | Click or tape here to enter text | | **IV.1.h.** | Do you have training programs covering tax transparency and prevention of tax evasion facilitation? |  |  | Click or tape here to enter text | | Are the programs mandatory to all your employees? |  |  | Click or tape here to enter text | | 1. **POLICIES AND PROCEDURES** | | | | | | **IV.2.a.** | Do you have formalized policies and procedures in place that comply with applicable AML, CFT, Sanctions and ABC regulations and requirements to reasonably prevent, detect and report money laundering, terrorist financing, Sanctions breach and bribery and corruption violations? |  |  | Click or tape here to enter text | | **IV.2.b.** | Do you have formalized policies and procedures that comply with applicable tax transparency regulations and requirements to prevent, to the extent possible, detection and reporting of tax evasion facilitation? |  |  | Click or tape here to enter text | | **IV.2.c.** | In accordance with the expectations of the FATF and most regulators, do you have a classification of money laundering and terrorist financing risks, taking into account in particular the risks associated with the customer base, the nature of the products and services provided, the distribution channels envisaged and the geographical areas of activity and transaction conditions? |  |  | Click or tape here to enter text | | If possible, provide a copy and indicate when it was last updated.  If not, please specify the reason |  |  | Click or tape here to enter text | | **IV.2.d.** | Do you have a differentiated approach in terms of risks concerning: |  |  | Click or tape here to enter text | | 1. AECs |  |  | Click or tape here to enter text | | 1. The origin or destination of assets from/to mixers/tumblers |  |  | Click or tape here to enter text | | 1. Any links with DARK WEB/Ransomware/Dark net ... |  |  | Click or tape here to enter text | | 1. Any links with VASP not subject to equivalent regulation/supervision |  |  | Click or tape here to enter text | | 1. Any links with VPNs or IP addresses linked to TOR, PROXYS |  |  | Click or tape here to enter text | | 1. Inconsistency between the IP address and the customer's country of residence |  |  | Click or tape here to enter text | | 1. Use of privacy wallet (see footnote 9) |  |  | Click or tape here to enter text | | 1. Use of multiple public addresses by a single client |  |  | Click or tape here to enter text | | **IV.2.e.** | Do you have a policy to identify and verify the identity of customers and, where applicable, beneficial owners? |  |  | Click or tape here to enter text | | Do you distinguish between business relations and occasional customers? |  |  | Click or tape here to enter text | | **IV.2.f** | Do you have a policy for refusing to open customer accounts and for terminating business relationships? |  |  | Click or tape here to enter text | | **IV.2.g.** | Do you have a policy/criteria for selecting service providers (especially liquidity providers – DEFI platform, etc.) |  |  | Click or tape here to enter text | | **IV.2.h.** | Have you put in place tools and procedures to enable you to collect and declare the mandatory/required information from your customers in order to comply with your reporting obligations (CARF/CDC/DAC8)[[19]](#footnote-20) to your local tax authorities? |  |  | Click or tape here to enter text | | **IV.2.i.** | Custody of third-party assets: Do you have a policy for safeguarding your customers' assets to protect their rights specifically in the event of insolvency and also to prevent the use of crypto-assets for your own account? |  |  | Click or tape here to enter text | | **IV.2.j.** | Managing conflicts of interest: Have you implemented procedures to detect, prevent and deal with conflicts of interest that may arise in the course of providing your services? |  |  | Click or tape here to enter text | | 1. **KNOW YOUR CUSTOMER** | | | | | | **IV.3.a** | Do you identify and verify the identity of all your customers before entering into a business relationship with them? |  |  | Click or tape here to enter text | | **IV.3.b** | Do you enter into non-face-to-face business relationships (percentage of face-to-face onboardings versus non-face-to-face)? |  |  | Click or tape here to enter text | | **If yes**, how do you verify the customers’ identity: by using electronic identification means and/or by implementing specific identification measures? |  |  | Click or tape here to enter text | | **If so**, please specify:  - Which means and/or measures,  - If you use them alone or cumulatively, and  - If you use a third-party provider for the certification of ID document? (*if so, please specify its name*) | Click or tape here to enter text | | | | **IV.3.c** | Do you apply different levels of due diligence to your customers? |  |  | Click or tape here to enter text | | **If yes**, for which type(s) of customers and explain the differences. | Click or tape here to enter text | | | | **IV.3.d.** | What is the volume of refusals to enter into a business relationship? (Percentage in relation to the total number of requests to enter into a relationship) | Click or tape here to enter text | | | | What is the volume of customers for whom you have terminated the business relationship? (Percentage by comparison with the overall number of customers) | Click or tape here to enter text | | | | On what criteria were these decisions to refuse or terminate business relationships most often based? | Click or tape here to enter text | | | | **IV.3.e.** | With regard to the beneficial owner(s)[[20]](#footnote-21) of your clients, based on what percentage of the capital or voting rights held by them, are you required to identify them? Please clarify whether this threshold is differentiated with regard to certain customers? | Click or tape here to enter text | | | | **IV.3.f.** | Besides this ownership threshold or when no shareholder reaches this threshold, do you identify the persons who exercise ultimate control? Specify how. |  |  | Click or tape here to enter text | | **IV.3.g.** | According to your internal processes and procedures, are you required to determine the source of wealth (SoW)[[21]](#footnote-22) and source of funds (SoF)[[22]](#footnote-23) of your customer(s) and their beneficial owner(s)? |  |  | Click or tape here to enter text | | **IV.3.h.** | Is the customer's country of residence corroborated by the IP address used? |  |  | Click or tape here to enter text | | **IV.3.i.** | Do you rate your customers according to the ML, FT, Sanctions and Bribery and Corruption risks they may present? |  |  | Click or tape here to enter text | | **IV.3.j.** | **If yes**, what factors/criteria are used to determine the customers risk rating: |  |  | Click or tape here to enter text | | 1. Type of customer (Politically Exposed Person (PEP), non-resident, legal entity, etc.) |  |  | Click or tape here to enter text | | 1. Product/service used, |  |  | Click or tape here to enter text | | 1. Geographical location, |  |  | Click or tape here to enter text | | 1. Type of activity/industrial sector, |  |  | Click or tape here to enter text | | 1. Type of legal entity, |  |  | Click or tape here to enter text | | 1. Negative news, |  |  | Click or tape here to enter text | | 1. Transaction conditions |  |  | Click or tape here to enter text | | 1. Distribution channels |  |  | Click or tape here to enter text | | 1. Other criteria (specify) |  |  | Click or tape here to enter text | | **IV.3.k** | **If yes**, does this financial crime risk rating have an impact over the level of due diligence you apply to your customers? |  |  | Click or tape here to enter text | | **IV.3.l.** | Do you screen your customers (including beneficial owners) at onboarding and regularly thereafter against Sanctions lists, Politically Exposed Persons (PEP) list, and do you proceed to negative news checks? |  |  | Click or tape here to enter text | | What methods are used (manual or automatic)? What is the filtering frequency? | Click or tape here to enter text | | | | **IV.3.m.** | Which categories of customers, industries, countries, and products/services, are subject to Enhanced Due Diligence (EDD)[[23]](#footnote-24) and/or are restricted under your Financial Crime Compliance program? | Click or tape here to enter text | | | | **IV.3.n.** | Do you have lists formalizing your risk appetite? (e.g., list of customers, industrial sectors, countries, and products (in particular certain types of digital assets) with which you prohibit all relationship?) |  |  | Click or tape here to enter text | | **IV.3.o.** | Do you have any non-resident customers?[[24]](#footnote-25) |  |  | Click or tape here to enter text | | **IV.3.p.** | Do you have any US tax resident customers? |  |  | Click or tape here to enter text | | **IV.3.q.** | Do you have any customers who are U.S. citizen or U.S. green card holder? |  |  | Click or tape here to enter text | | **IV.3.r.** | Do you have customers which use mixers, tumblers or any other anonymization tools? |  |  | Click or tape here to enter text | | **If yes**, are you able to detect any "mixer/tumbler" of assets transferred by your client? |  |  | Click or tape here to enter text | | How do you identify and monitor them? | Click or tape here to enter text | | | | **IV.3.s** | Do you have customers which use AEC/privacy coins or any other types of anonymity-enhanced virtual assets? |  |  | Click or tape here to enter text | | **If yes,** are you able to detect if funds are coming from an AEC transaction? |  |  | Click or tape here to enter text | | **IV.3.t** | Do you hold any anonymous account for any of your customers? |  |  | Click or tape here to enter text | | **IV.3.u.** | Do you have customers who are located in countries or who operate from countries: |  |  | Click or tape here to enter text | | 1. Subject to Comprehensive Sanctions[[25]](#footnote-26)? |  |  | Click or tape here to enter text | | 1. On the FATF list of high-risk and other monitored jurisdictions[[26]](#footnote-27)? |  |  | Click or tape here to enter text | | 1. On the EU list of high risk third countries[[27]](#footnote-28)? |  |  | Click or tape here to enter text | | 1. In conflict zones? |  |  | Click or tape here to enter text | | **IV.3.v** | **If answer to any of the above questions (3.u.1. to 3.u.4. included) is yes:** what specific measures have been taken in terms of customer due diligence, transaction monitoring, IP address monitoring others? | Click or tape here to enter text | | | | **IV.3.w.** | Do you have a process to review and update customer information based on KYC renewal? |  |  | Click or tape here to enter text | | **If yes,** what is the frequency of your KYC renewal and is it linked to the customer risk rating or another element? | Click or tape here to enter text | | | | **IV.3.x.** | Do you have a process to review and update customer information based on any trigger event? |  |  | Click or tape here to enter text | | **If yes**, can you give some examples of trigger events that trigger KYC review? | Click or tape here to enter text | | | | **IV.3.y.** | Do you rely on any third-party to carry out any of your KYC and/or AML-FT obligations? |  |  | Click or tape here to enter text | | **If yes**, please provide additional details. (What is the scope of delegation?) | Click or tape here to enter text | | | | **IV.3.z** | Business relationship with a business introducer, distributor, or any other financial service provider (FSP) such as correspondent VASP[[28]](#footnote-29)or custody provider:   * Do you have a policy of selecting your FSPs according to the country in which they are regulated? |  |  | Click or tape here to enter text | | When entering into a business relationship with a business introducer, distributor, or any other financial service provider (FSP) such as correspondent VASP or custody provider :   * Do you ensure that the FSP's Financial Crime Compliance procedures (including KYC, AML, CFT, Sanctions and ABC, tax transparency…) are similar to your own procedures? * Do you apply your own due diligences on the customers of such FSP and their beneficial owners? |  |  | Click or tape here to enter text | | 1. **MONITORING SCREENING AND ANALYSIS** | | | | | | **IV.4.a** | Do you have a Sanctions screening process in place to detect any potential breach of Sanctions? |  |  | Click or tape here to enter text | | **If yes**, specify the method used ? (manual or automatic)? | Click or tape here to enter text | | | | What is the frequency of screening? | Click or tape here to enter text | | | | Is it applied to both incoming flows and outgoing flows? |  |  | Click or tape here to enter text | | Can you please describe your Sanction screening program and your Sanction breach process? |  |  | Click or tape here to enter text | | **IV.4.b** | Do you have a FIAT currency transaction monitoring tool which generates AML/CFT alerts? | ☐ | ☐ | Click or tape here to enter text | | **If yes**, specify the method used (manual or automatic)? | Click or tape here to enter text | | | | Is it applied to both incoming flows and outgoing flows? |  |  | Click or tape here to enter text | | **IV.4.c.** | Do you rely on third party to carry out any of your transaction monitoring and sanctions screening? |  |  | Click or tape here to enter text | | **If yes**, provide further details (e.g., What is the scope of delegation? Other relevant information) | Click or tape here to enter text | | | | **IV.4.d.** | Do you have a blockchain transaction analysis tool (BTAT) for virtual asset transfers? |  |  | Click or tape here to enter text | | **If yes**, please specify the tool(s): internal tools/external tools or both? | Click or tape here to enter text | | | | **IV.4.e.** | Under which circumstances or upon which criteria do you trigger a blockchain analysis? | Click or tape here to enter text | | | | **IV.4.f.** | Are you able to accurately trace virtual asset flows on public blockchain end-to-end?  **If no,** please explain. |  |  | Click or tape here to enter text | | **IV.4.g.** | Are you able to detect if a transaction was made using an anonymization protocol? |  |  | Click or tape here to enter text | | Under what circumstances? (Do you have a risk-based approach to your investigations)? | Click or tape here to enter text | | | | Are you able to segregate these flows? |  |  | Click or tape here to enter text | | **IV.4.h** | Does the crypto BTAT you use assign a risk score to the transactions? |  |  | Click or tape here to enter text | | Or do you have your own transaction risk rating scoring methodology? |  |  | Click or tape here to enter text | | **If yes**, please specify. |  |  | Click or tape here to enter text | | **IV.4.i.** | According to your previous answer, what do you do if funds you have already received seem too risky or 'tainted' negatively? Do you return the funds to the issuer, or do you choose to accept them? | Click or tape here to enter text | | | | **IV.4.j.** | Do you adjust the analysis of your transaction / customer due diligence in accordance with that score and the KYC risk profile? If so, please provide details. |  |  | Click or tape here to enter text | | **IV.4.k.** | Do you have investigations processes in place in order to analyze alerts raised by the monitoring and screening tools?  Please explain how this process is organized. |  |  | Click or tape here to enter text | | What is the percentage of alerts that are followed by an investigation? | Click or tape here to enter text | | | | How many are followed by a SAR[[29]](#footnote-30) and how many are closed without submitting a SAR? | Click or tape here to enter text | | | | Please specify the percentages of SAR reported thanks to:   * FIAT Tools * Crypto BTAT * Human Vigilance | Click or tape here to enter text | | | | **IV.4.l.** | Do you have a process in place to participate in public authorities ‘investigations? |  |  | Click or tape here to enter text | | 1. **PAYMENT TRANSPARENCY** | | | | | | **IV.5.a.** | Do you have policies, procedures and processes to reasonably comply with and have controls in place to ensure compliance with FATF recommendation 16 (travel rule) [[30]](#footnote-31)? |  |  | Click or tape here to enter text | | 1. **CONTROLS AND AUDIT** | | | | | | **IV.6.a.** | In addition to the controls carried out by supervisors/regulators, do you have an internal audit function, testing function or other independent third-party function-or both- that regularly assesses the effectiveness of your AML/CTF, sanctions & embargoes, ABC? |  |  | Click or tape here to enter text | | **IV.6.b** | How often is your AML/CTF, sanctions & embargoes and ABC process/procedures evaluated by: |  |  | Click or tape here to enter text | | 1. Internal audit |  |  | Click or tape here to enter text | | 1. External third party |  |  | Click or tape here to enter text | | **IV.6.c** | Do these controls cover the following areas: |  |  | Click or tape here to enter text | | 1. Risk assessment of your activities |  |  | Click or tape here to enter text | | 1. Your governance |  |  | Click or tape here to enter text | | 1. KYC/CDD[[31]](#footnote-32)/EDD and related procedures |  |  | Click or tape here to enter text | | 1. Establishment of lists and screening of business relationships |  |  | Click or tape here to enter text | | 1. Key indicators and feedback to Senior Management |  |  | Click or tape here to enter text | | 1. SAR reporting activity |  |  | Click or tape here to enter text | | 1. The IT tools linked to the reporting activity and transaction monitoring |  |  | Click or tape here to enter text | | 1. Transaction monitoring |  |  | Click or tape here to enter text | | 1. Transaction filtering (including for embargoes and sanctions screening) |  |  | Click or tape here to enter text | | 1. Staff training and awareness |  |  | Click or tape here to enter text | | 1. Outsourced services relating to your financial security obligations |  |  | Click or tape here to enter text | | 1. The quality of the financial security framework of your service providers |  |  | Click or tape here to enter text | | 1. Other (specify) |  |  | Click or tape here to enter text | | **IV.6.d** | Do you have a certificate of compliance issued by an authority, supervisor or audit firm? |  |  | Click or tape here to enter text | | **IV.6.e** | Are major failures followed by an action plan/corrective measure to remedy them? |  |  | Click or tape here to enter text | | 1. **OTHERS** | | | | | | **IV.7.a** | Do you have internal control framework aiming to check the proper implementation and the effectiveness of your security information (including cybersecurity) and anti-fraud policies procedures? |  |  | Click or tape here to enter text |   **IV.8. - Confirm that all responses provided are representative of all your legal entity’s branches:**  Yes  No  **If no**, please specify for which questions and, if applicable, which branches. Please provide a detailed explanation in case the financial security compliance program is not comparable to yours: Click or tape here to enter text |

**The signatory of this questionnaire certifies the accuracy of the replies to the above questions, and that he/she is authorised to sign on behalf of the company to which the questionnaire applies.**

Forename/Surname: Click or tape here to enter text

Position: Click or tape here to enter text

On: Click or tape here to enter text

In: Click or tape here to enter text

Signature and stamp of the company



1. Append a list of foreign branches which are covered by this questionnaire if any. For the sake of clarity, each legal entity shall be subject to its own questionnaire; therefore, this questionnaire is only valid for the legal entity answering to it and its branches as the case may be but shall not be valid for its subsidiaries. Each subsidiary, as a separate legal entity, shall complete its own questionnaire. [↑](#footnote-ref-2)
2. Anti-Money Laundering and Terrorist Financing – AML-CFT [↑](#footnote-ref-3)
3. Over-The Counter [↑](#footnote-ref-4)
4. Including services subject to mandatory registration or for which an optional autorisation has been requested. [↑](#footnote-ref-5)
5. Cold wallets (“cold wallets”) are storage solutions outside the blockchain (cold storage) of private keys, that is, without any direct access to the Internet. [↑](#footnote-ref-6)
6. A custodial wallet means that you hold the private keys with which you approve/sign your customers’ transactions and thus control their crypto assets. [↑](#footnote-ref-7)
7. A non-custodial wallet means that your customers retain control of their crypto assets, including private keys management, and you have no access to the customers’ private keys. [↑](#footnote-ref-8)
8. AEC (Anonymity-Enhanced Crypto Currency): refers to a class of virtual assets designed to promote the anonymity of its holders by relying on untraceable blockchains; Monero, Zcash, Grin or Dash are examples commonly cited as AEC. Their use allows the counterparties of a transaction to ensure their anonymity while allowing a configuration of the level of confidentiality. The usual expression Privacy coin is equivalent to AEC. [↑](#footnote-ref-9)
9. Privacy wallets are software allowing a person to keep their digital assets themselves, while integrating functionalities allowing the transactions of several people to be combined in the same transfer, which reduces the visibility of these flows of digital assets. [↑](#footnote-ref-10)
10. Mixers (“mixers”) and mixers (“tumblers”) are services that enhance the anonymity of digital assets by mixing several flows of the same type of traceable digital asset (bitcoin for example) from several public addresses in order to send them to other public addresses, causing a break in the chain of custody of these digital assets in the holding history of the various wallets. Source: excerpt from the Sector Application Principles for Virtual Asset Service Providers (VASP), ACPR, November 2022. [↑](#footnote-ref-11)
11. As opposed to individual addresses per customer. That is, a portfolio that combines customer assets while maintaining customer-by-customer segregation in books and records. [↑](#footnote-ref-12)
12. ATM = Automated Teller Machine (DAB) [↑](#footnote-ref-13)
13. Article 33 and Article 63 of the forthcoming MICA Regulation. [↑](#footnote-ref-14)
14. This may be article 33 paragraph 4 of MICA relating to the custody of reserve assets linked to asset reference Tokens or article 49 of the MICA regulation relating to obligations linked to the issuance of e-money Tokens. [↑](#footnote-ref-15)
15. An escrow account is an account used to monitor and safeguard the funds collected as part of an ICO in accordance with regulatory obligations (art. 712-7 of the RGAMF). It may also be an account with reference to the obligations described in article 33 of MICA relating to asset reference tokens or article 49 of MICA relating to funds received in exchange for “e-money tokens”. [↑](#footnote-ref-16)
16. If the answer is “No”, please provide an appropriate explanation in the « remarks » section. [↑](#footnote-ref-17)
17. Anti-Bribery and Corruption [↑](#footnote-ref-18)
18. National body or unit responsible for receiving, analyzing and disseminating financial intelligence submitted through the Suspicious Activity Reports (SARs). [↑](#footnote-ref-19)
19. The 8th European Directive on administrative cooperation (DAC8) reinforces the obligations related to CRS (Common Reporting Standard) in the fight against tax evasion and introduces an obligation to report transactions involving Crypto-assets – Crypto Actif Reporting Framework (CARF). [↑](#footnote-ref-20)
20. Beneficial owners are natural persons who directly or indirectly controls a customer or, the natural person on whose behalf a transaction/activity is being conducted. [↑](#footnote-ref-21)
21. Determining the Source of Wealth implies collecting information as to how the customer’s wealth was generated (for instance, inheritance, professional revenues, savings...) [↑](#footnote-ref-22)
22. Determining the Source of Funds involved in the Business Relationship or transaction implies collecting information on the means through which the funds were transferred to the customer’s account and how such funds were generated (the origin of the funds may be the origin of the customer wealth) [↑](#footnote-ref-23)
23. Enhanced Due Diligences [↑](#footnote-ref-24)
24. Persons, whatever their nationality, French or foreign, who have their main residence abroad as well as legal persons domiciled or registered abroad. [↑](#footnote-ref-25)
25. As per the Société Générale Group Policy, countries subject to Comprehensive Sanctions are Cuba, Iran, North Korea, Syria, the Crimea Region and the Donetsk and Luhansk Regions [↑](#footnote-ref-26)
26. <https://www.fatf-gafi.org/en/countries/black-and-grey-lists.html> [↑](#footnote-ref-27)
27. [High risk third countries and the international context content of anti-money laundering and countering the financing of terrorism - European Commission (europa.eu)](https://finance.ec.europa.eu/financial-crime/high-risk-third-countries-and-international-context-content-anti-money-laundering-and-countering_en) [↑](#footnote-ref-28)
28. A correspondent relationship is the provision of Virtual Asset services by one VASP to another VASP or FI. For example, VASP white labelling its platform functionality to another VASP and also providing nested services (providing accounts to smaller VASPs for access to liquidity and trading pairs). [↑](#footnote-ref-29)
29. A suspicious transaction report to the CRF (Financial Intelligence Center) [↑](#footnote-ref-30)
30. [FATF Recommendations 2012.pdf (fatf-gafi.org)](https://www.fatf-gafi.org/media/fatf/documents/recommendations/pdfs/FATF%20Recommendations%202012.pdf) : In particular, financial institutions shall include required and accurate originator information, and required beneficiary information, on wire transfers and related messages, and that the information remains with the wire transfer or related message throughout the payment chain. [↑](#footnote-ref-31)
31. CDD : Customer Due Diligences [↑](#footnote-ref-32)