



Letter on financial security

FORM FOR 1) INSURANCE COMPANIES, 2) OTHER FINANCIAL INSTITUTIONS AND 3) FUNDS AND AMC (asset management companies)

Confidential information

BNP Paribas Group, as an international banking group, has broad and significant liabilities set by regulators around the world. In addition, the BNP Paribas Group, including its subsidiaries and affiliates, undertakes to comply with all applicable laws, rules and regulations in the jurisdictions in which it operates, in particular with regard to economic sanctions, anti-money laundering (legalization of income), anti-bribery and corruption, and combating terrorist financing.

BNP Paribas has adopted and supports the Compliance program, based on a risk assessment system, in order to prevent and detect violations of economic sanctions, money laundering, bribery and corruption risks, terrorist financing, and to provide a sound financial basis for our customers.

The letter on financial security is used to ensure that our clients take appropriate measures related to economic sanctions, anti-money laundering (legalization of income), financing terrorism and combating bribery and corruption.

PLEASE SIGN AND RETURN THIS LETTER

Company Name: _____

Company Group Name: _____ *or*

Parent Company Name: _____

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LETTER ON FINANCIAL SECURITY

1. We reaffirm that our Institution and all of our separate divisions and subsidiaries, in our country and abroad, comply with applicable laws, rules and regulations relating to economic sanctions, anti-money laundering, terrorist financing, the fight against bribery and corruption.
2. We acknowledge that our Institution and all of our separate divisions and subsidiaries have adopted and are implementing the Compliance program, which is based on a risk assessment system and includes the necessary organization, tools, internal written procedures and policies, training and monitoring tools, including independent testing. - Financial Security Program) in accordance with the current economic sanctions, anti-money laundering (anti-money laundering) and terrorist financing, as well as current legislation, rules and regulations on combating bribery and corruption. We carry out other controls in accordance with this Financial Security Program and the requirements of current legislation and other regulations.
3. As part of our Financial Security Program, we have set appropriate standards.
In particular:
 - ✓ introduced the Know Your Customer Program (hereinafter referred to as the "Know Your Customer" Program), according to which we conduct due diligence of clients taking into account the risk-oriented approach for all the clients in accordance with current legislation and regulations, including identification and verification of their Clients, their ultimate beneficial owners and authorized persons.
 - ✓ in addition, taking into account the risk-oriented approach, we carry out enhanced due diligence measures for high-risk clients (for example, relationships with politically significant persons), as well as carry out due diligence measures taking into account the risk-oriented approach and constantly monitor all clients to identify and report of suspicious activity. We store documents (including electronic ones), their copies, records, data, information on measures taken to comply with the requirements in the field of prevention and counteraction, in particular on the proper verification of customers, including identification and verification of customer representatives, final beneficial owners), as well as all documents relating to the business relationship with the client, not less than five years after the termination of the business relationship with the client;
 - ✓ We have written policies and procedures, as well as controls, designed to ensure that we do not establish or maintain relationships with shell banks¹;
 - ✓ We inspect the client base (including those that carry out financial transactions without establishing business relations), as well as persons acting on behalf of our clients, filter transactions in accordance with the legislation in the field of anti-money laundering, terrorist financing, counter-terrorism bribery and corruption, sanctions;
 - ✓ We have well-established systems and processes in place to maintain constant vigilance and prompt detection of suspicious transactions and to report of suspicious/atypical activities (SARs) to the appropriate authority;
 - ✓ We have a program to prevent and detect bribery and corruption;
 - ✓ We have a consistent training program to properly educate employees on financial security risks.
4. Upon your (BNP Paribas Group) request, without undue delay and within the current legislation, we will provide information on a) the type of business or activity, b) inquiries and proceedings of regulatory and supervisory authorities, c) anti-money laundering measures and controls concerning the legalization of income, financing of terrorism, fight against bribery and corruption, sanctions, and d) any party (including clients, their proxies /authorized representatives and ultimate beneficial owners) involved in any transactions, payments, transfers etc.), including the economic purpose / justification of these transactions, which were carried out using accounts and / or services provided by the BNP Paribas Group, to the extent required by local law for the storage of such data. It is envisaged that the information provided will be used by the BNP Paribas Group for compliance with applicable legal and regulatory requirements.
5. We recognize that BNP Paribas' global policy, based on internal risk assessment and the economic situation, prohibits the processing or otherwise participating in any activity and / or making payments / transfers (regardless of the type of currency and even when such activity / payments / transfers may be legal) for, on behalf of, or for the benefit of an individual or legal entity, the organization² under the sanctions of France, the United Nations, the European Union or the United States, or other applicable sanctions regimes.

¹ According to the FATF recommendations, a shell bank is a bank that does not have a physical presence in the country where it is registered and licensed and that is not affiliated with a regulated financial group that is subject to effective consolidated supervision.

² Including a legal entity, which in the amount of 50% or more is directly or indirectly owned or which is directly or indirectly controlled by such individuals and legal entities, organizations under sanctions; or natural and legal persons acting on behalf of such natural and legal persons, organizations subject to sanctions.



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We hereby confirm that, except as disclosed by BNP Paribas, none of our institutions, its affiliates, subsidiaries, directors and other officers are owned / controlled or controlled by Sanctioned Persons.³

6. We confirm that the information contained in this Letter is true and we agree to notify BNP Paribas immediately of any material changes to the information provided.

Name of the authorized representative of the client⁴

Signature of the authorized representative of the client (MP if necessary)

(date)

³ For the purposes of this document, the term "sanctioned person" refers to any natural or legal person ("person") who is either directly or indirectly owned or controlled by a person who is the subject of any economic sanctions or restrictive measures, which are enacted, administered or applied by the United States, the United Nations Security Council, the European Union, the French Republic or any other appropriate sanctioning body.

⁴This Letter must be signed by an duly authorized person belonging to the Client's Senior Management / the Client's parent company / the Client's Head Company, who has the right to act on behalf of the company. For example, including, but not limited to: the Head of the Company / Head of the Client's parent company / Head of the Client's Head Company or other Client's Authorities / Client's parent company / Client's Parent Company who has the right to provide relevant information and documents based on supporting documents.

