

Brest, March 31, 2025

Statement regarding Crédit Mutuel Arkéa's Anti-Money Laundering (AML) and Counter-Terrorist Financing (FT) Policies and Principles

Crédit Mutuel Arkéa has established and implemented a comprehensive set of policies and procedures as far as anti-money laundering (ML) and combating the financing of terrorism (FT) is concerned. The goal is to ensure the Bank's compliance with the existing regulatory AML-FT framework and, in this respect, prevent the Bank from being used for any illegal operations.

General presentation

The Group Crédit Mutuel Arkéa (Group CMA) is a mutualist bancassurance group, incorporated under French law, with its headquarters in Brest, France.

Within the Group, Crédit Mutuel Arkéa (CMA - the "Bank") is a regulated credit institution, authorised and supervised by the ACPR (Autorité de Contrôle Prudentiel et de Résolution), regulated by the AMF (Association des Marchés Financiers) and under the prudential supervision of the European Central Bank.

The Group is fully committed to ensuring compliance with economic and financial sanctions and asset freezes, the prevention of money laundering, corruption, tax evasion, as well as the fight against the financing of terrorism and the financing of proliferation.

The Group has technical and human resources and an AML-FT policy that applies to all subsidiaries. Each entity then establishes its own operating procedures in accordance with the Group general guidelines, without prejudice to more stringent local regulations.

Crédit Mutuel Arkea's AML-FT system

The Group has a robust compliance program, conceived on a risk-based approach, and designed to ensure compliance with AML-FT laws and regulations in the various countries where it operates (France, Belgium). The program, consisting in policies, procedures, processes, training, formalized controls, and an internal AML/CFT reporting for the Bank's management bodies supplemented by a regulatory reporting system for the supervisory authorities, is fully adapted to the Group's structure and activities.

A significant number of employees and resources are dedicated to AML-FT, in particular

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within the framework of a department that includes both Compliance and Permanent Control functions. The department is responsible for developing a complete AML-FT prevention approach, validated by General Management and duly implemented. The Head of Compliance and Permanent Control directly reports to the Managing Director and regularly informs the Bank's management bodies (Executive Committee, Board of Directors) of the developments and actions undertaken.

The AML-FT program is updated on an ongoing basis in order to comply with the existing regulatory framework (including guidelines, recommendations and opinions of international, European and national bodies). In particular, the Group takes into account:

- The 4th and 5th European directives on LCB-FT and their transposition into French laws and regulations pending the full application of the new AML VI package of the European Union,
- French laws and regulations and their subsequent amendments enacted to combat ML-FT,
- FATF standards and controls (of which France is a founding member),
- The various guidelines that are regularly published by the European and French regulators (EBA and ACPR/AMF).

Overall, the AML-FT program includes :

- an in-depth and up-to-date know-your-customer (KYC) framework, based on a risk-based approach,
- enhanced identification and verification measures for high-risk clients and situations, including politically exposed persons (PEPs),
- a screening of customer databases (twice a day) and transactions (real-time) thanks to a common tool set up in all Group entities,
- a sanctions compliance policy, notably with enhanced analysis of payments to and from certain high-ML-FT risk countries and territories,
- systems and processes for internal transmission of ML-FT doubts and suspicions to the Experts authorized, if necessary, to report them to the competent authorities,
- adapted training for employees,
- permanent and periodic controls,
- an internal AML/CFT reporting for the Bank's management bodies, to enable them to take the necessary corrective measures to ensure the effectiveness of the AML/CFT system, both at Group level and within the reporting entities, supplemented by a regulatory reporting system for the supervisory authorities.

The AML-FT policy as a whole, which applies to all employees, is constantly being strengthened in the light of regulatory changes and risk assessment.

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Focus on customer due diligence

Crédit Mutuel Arkéa has a "Know Your Customer" (KYC) approach designed to identify and confirm the identity of its customers. Each customer is assigned a ML-FT risk profile based on a combination of relevant risk factors (related to customer characteristics, products and services, relationship and transaction channels, countries involved in the relationship and transactions).

The KYC of the customer, including its beneficial owners, shareholders, and representatives where applicable, is carried out prior to entering into the business relationship as well as updated throughout the whole relationship.

In addition to the identification and verification of a customer's identity, the information necessary for customer knowledge and for a full understanding of the purpose and nature of the relationship is collected and analysed, in accordance with AML-FT regulations. Constant vigilance makes it possible to keep an appropriate and up-to-date knowledge of its customer relationships. KYC is updated at a frequency that depends on the level of risk assigned to the customer.

Crédit Mutuel Arkéa is also required by law to keep documents relating to customer files for at least five years from the date of termination of the relationship, and from the date of its execution as far as transactions are concerned.

Focus on enhanced due diligence measures

Situations of high ML-FT risk lead the Bank to set up additional and/or reinforced vigilance measures, for example:

- a review of high-risk customers KYC on an annual basis,
- the collection and analysis of additional documents and information for a comprehensive customer knowledge,
- appropriate controls, either automatically or manually, at the beginning as well as throughout the whole relationship,
- an enhanced monitoring of the relationship, in particular with increased detection limits (e.g. higher number and frequency of checks, adapted criteria and thresholds...) to trigger further transaction examinations.

High-risk activities include among other things:

- customers meeting the definition of politically exposed persons ("PEP"), as well as their families and close associates, where applicable;
- high-risk countries and territories (e.g. subject to enhanced FATF surveillance, listed by the EU as having strategic ML-FT deficiencies, or under embargo).

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Any entry into a relationship with a PEP or a high-risk country or territory must, after a detailed opinion from the Compliance Department, be approved by General Management.

Furthermore, various services and types of customers are considered high risk and hence are prohibited by the Bank. The exclusion rules cover, for example:

- Anonymous accounts,
- Shell banks,
- Persons under sanctions and asset freeze measures,
- Persons for whom there is a lack of identification or verification of their identity or a doubt as to the nature of the relationship,
- Persons for whom there is a doubt concerning their respectability,
- Illegal activities (e.g. illegal substances),
- All transactions involving certain risky and/or embargoed countries,
- All transactions involving certain undesirable banking institutions.

Focus on international sanctions

All of the Group's entities are required to comply with sanctions imposed by the countries in which they operate.

For each relationship, before opening an account as well as on an ongoing basis, Crédit Mutuel Arkéa's system enables the Bank to detect the applicable economic/financial sanctions, so as to enforce the immediate asset freeze measures if need be, and set up the appropriate measures in such situations.

The Bank takes into account, among others, the sanctions lists of the European Union, France and the United Nations: its automated filtering system enables it to screen its customers, their beneficial owners and, where applicable, their representatives, and to verify, prior to the execution of any transaction, that no counterparty is in violation of a sanctions regime or is on a list of known or suspected terrorists.

When a situation likely to be concerned by an embargo or a sanction measure has been detected, an enhanced review is carried out with a view to deciding on the measures to be taken.

Focus on reporting suspicious transactions and cooperating with the authorities

The Bank's automated transaction filtering system has been built to detect any unusual or suspicious behaviour, or any behaviour that is not consistent with the expected account or customer activity. All alerts thus generated are monitored and analysed in order to understand their economic logic and verify their legality. When a doubt persists at the end of this analysis, or when the situation immediately presents a significant level

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of ML-FT risk, the case must be escalated for further examination by an AML-FT Expert and possibly lead to a suspicious transaction report.

In accordance with applicable laws and regulations, including privacy and data protection laws, Crédit Mutuel Arkéa fully cooperates with government and law enforcement authorities and reports any suspicion of ML-FT to the French Financial Intelligence Unit, TRACFIN.

Training

As part of its training policy, and in accordance with current regulations, each Group entity is responsible for providing its employees with appropriate initial and ongoing training.

Crédit Mutuel Arkéa has formalised and implemented appropriate processes to train its staff on Financial Security, and to raise their awareness on subjects such as the fight against money laundering and financing of terrorism, corruption, tax evasion or proliferation.

The training measures apply to all employees exposed to such risks, depending on their level of exposure, as well as to effective managers and members of the Board of Directors.

The training plan defines for each population, the terms of the initial and continuous training to be provided to them (scope, frequency of sessions, type of support and methods of running the sessions (e-learning, plenary meeting, etc.) in order to guarantee the adaptation and development of their skills and thus contribute to further securing the whole system.

Screening of all employees involved in AML-FT functions

The Group has set up a screening system for the staff involved in implementing its AML/FT obligations. Appropriate due diligence and checks against national or European sanctions lists are carried out on any person at an advanced stage of recruitment to join the company in a position involving AML-FT-related functions.

Audit

The Bank's internal audit teams regularly audit the Compliance and Permanent Control Department. Findings relating to AML-FT identified during these missions are communicated to the Compliance and Permanent Control Department, to General Management, to the Board of Directors and, if necessary, to the regulatory authority.

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For further information regarding the Crédit Mutuel Arkéa AML-FT program, please refer to the website www.cm-arkea.com.

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