

Company Name:

Company Group Name:

PLEASE COMPLETE AND RETURN THE ADDENDUM

RUSSIA QUESTIONNAIRE – FINANCIAL INSTITUTIONS (EXCL. CBK)

BNPP is keen to ensure that its financial institution ("FI") clients have controls and systems in place to detect, prevent and combat sanctions evasion and circumvention.

1. Are you or any of your subsidiaries/branches or joint ventures, located in or operating from Russia?

YES ☐ NO ☐ If YES, please describe:

2. Are you or any of your subsidiaries/branches or joint ventures, directly or indirectly, engaged in transactions, investments, provision of services or other business, that involve Russia or provide benefits to Russia directly or indirectly?

YES ☐ NO ☐ If YES, please describe:

3. Are you or your subsidiaries/branches a participant or member of, the Russian System for Transfer of Financial Messages (SPFS) and/or MIR payment system?

YES ☐ NO ☐ If YES, please describe the use/purpose:

4. Do you or any of your subsidiaries/branches have clients that directly or indirectly conduct business involving Russia or high-risk transshipment areas that are known to be facilitating the export or reexport of materials or components in support of Russia's war effort, and such business activities are routed through BNP Paribas products or services?

YES ☐ NO ☐ If YES, please describe:

¹ Indirect activities include, but are not limited to participating, facilitating, making available funds or resources for, or aiding transactions, investments, dealings with goods, services or technology involving Russia, including involving third party intermediaries, or banks/FIs associated with these transactions, investments, products or services.



BNP PARIBAS

The bank
for a changing
world

Classification : Confidential (intra and extragroup use)

5. Do you have a set-up in place to detect, assess and monitor your clients' activities (retail customers, wealth management customers, corporate customers, banks customers) which might be indicative of a Russia sanctions² circumvention, including activities via countries identified as high-risk transshipment areas that are known to be facilitating the export or reexport of materials or components in support of Russia's war effort?

YES ☐ NO ☐

If YES, please describe. In particular, have you identified clients which sector of activity involves sensitive goods/services subject to Russian sanctions²? If so, what EDD / ring-fencing measures have you established?

6. Do you have adequate procedures/processes in place to ensure that BNP Paribas' products and services are not used for transactions involving sensitive goods/services that are prohibited/restricted by EU or US sanctions² on Russia, or having Russia as a final destination?

YES ☐ NO ☐ Please provide any relevant comments/outcome:

² Please refer to the following regulations:

- [Annex I to Regulation \(EU\) 2021/821 / CL2021R0821EN0040010.0001.3bi_cp 1..1 \(europa.eu\)](#)
- [Annex of EU Regulation 833/2014](#)
- [Common Military List of the European Union](#)
- [List of common high priority items \(europa.eu\)](#)
- [OFAC list of items of Dec. 22, 2023, determined pursuant to E.O. 14024, Sec. 11 \(a\)\(ii\)](#)
- [Guidance for EU operators: Implementing enhanced due diligence to shield against Russia sanctions circumvention - guidance-eu-operators-russia-sanctions-circumvention_en.pdf \(europa.eu\)](#)
- [OFAC Guidance Memo for Foreign Financial Institutions June 2024](#)

Company hereby represents that the statements above are fully accurate:

- COMPANY NAME:
- COMPANY ADDRESS:
- COMPANY GROUP NAME (if applicable):
- COMPLETED BY* (name and title):
- SIGNATURE:
- DATE:

**This Russia questionnaire must be completed by a Senior Representative(s) of the Client who is/are in a position to respond on behalf of the Company and can assert and commit to the accuracy of the Russia Questionnaire (independently of being appointed as authorized signatory). Examples include but are not limited to: CEO, CFO, COO, President, Treasurer, Legal or Compliance Representative, or other Senior Representative(s).*

