Amundi
CRÉDIT AGRICOLE GROUP

AML / CFT / International Sanctions Policies

Description of Amundi practices, procedures and declaration of conformity

This document aims at describing Amundi Group anti-money laundering, counter-terrorism financing and international sanctions policies, practices and procedures implemented in order to comply with the sanctions laws and regulations in the jurisdictions in which Amundi operates.

It is intended to help you to understand Amundi's AML/CFT and international sanctions system.

Information disclosed here apply to Amundi, including all branches, representative offices, and subsidiaries part of Amundi exclusive perimeter of control ("Amundi") both in France and in other jurisdictions.

1. Anti-Money Laundering and Counter-Terrorism Financing requirements

General practices, policies and procedure

Laws and regulations on money laundering prevention applicable in France	Fourth EU AML Directive and any following EU AML Directive enforced or forthcoming French Monetary Code
Headquartered in a country member of a Financial Action Task Force (FATF)	Yes - France

2. Exposure to sensitive sanctioned countries, list based sanctions regimes, and countries forbidden in respect of Amundi internal policy

Amundi is committed to complying with the sanctions laws and regulations of France, the European Union, the United Nations, the United States Department of the Treasury's Office of Foreign Assets Control (OFAC), the United Kingdom, the Canada as well as applicable sanctions laws and regulations in the jurisdictions in which the group Amundi operates.
In addition, Amundi does not have any presence or planned activities in the following countries and territories: Cuba, Crimea - Donetsk - Luhansk - Kherson - Zaporijjia (Ukraine related), Iran, North Korea, Belarus, Myanmar and Syria.

3. Description of Amundi Anti-Money Laundering, Fight Against Terrorism Financing and International Sanctions compliance policy

Amundi complies with the highest standards of anti-money laundering practices in all markets and jurisdictions in which Amundi operates. Amundi has established and implemented a control system to ensure compliance with European Union anti-money laundering requirements, which mainly consists of the following measures:

- to designate an AML Officer, in charge of the fight against money laundering and terrorism financing.

  Regulatory rules require a firm to appoint an individual as an AML Officer, with responsibility for oversight of compliance with regulatory rules on systems and controls against money laundering, whilst ensuring a level of authority and independence within the firm. Amundi has appointed a dedicated AML Officer who acts as the focal point for all activities relating to anti-money laundering.

- to implement internal procedures and update them on a regular basis

  Amundi has established and maintains adequate and appropriate policies and procedures to prevent money laundering and Countering Financing of Terrorism. This adheres to Amundi legal and regulatory obligations. Policies and procedures are updated on a regular and appropriate basis by the AML Officer.

- to identify and know the customers (KYC) and final beneficiaries on a risk-based approach including ownership and control structure of the customer, when applicable.

  Amundi policies and procedures set out the obligatory requirements to verify the identity of clients to whom Amundi provides financial services, but also the Ultimate Beneficial Owners (UBOs), Legal Representatives and Authorized Signatories as appropriate.

- to identify and know the non-customer third parties (issuers, brokers, banks, counterparties, vendors ...) with whom Amundi is in a relationship.

- Mandatory training for all Amundi staff ensures that all employees are aware of their responsibilities and adherence to KYC policy.

- to identify politically exposed persons or an immediate family member or close associate of a politically exposed person (PEP) and apply procedures to mitigate associated ML/TF risks. If Amundi identifies a PEP, enhanced due diligences measures would be applied using a risk based approach.

- to comply with FATF recommendations

- Amundi has adopted and implemented FATF standards and conforms with FAFT and the European Union Directive in order to combat money laundering and terrorism financing and protect the integrity of the financial system.to comply with the sanctions laws and regulations of France, the European Union, the United Nations, the United States Department of the Treasury's Office of Foreign Assets Control (OFAC), the United Kingdom, the Canada as well as other applicable sanctions laws and regulations in the jurisdictions in which the group Amundi operates.

  Amundi takes reasonable measures to ensure that it does not enter into/maintain relationships with sanctioned person named on these lists

- to screen on a periodic basis its customers and its non-customer third parties (issuers, brokers, banks, counterparties, vendors...) against those list of international sanctions

- to screen on a periodic basis its customers and its non-customer third parties (issuers, brokers, banks, counterparties, vendors...), against the lists of persons suspected of criminal activity or terrorism published by legal and regulatory authorities, in order to freeze their assets should the case arise.

- Amundi has a regulatory obligation to report any suspicious activity to relevant authorities. The AML Officer is responsible for ensuring she/he has access to all resources and available information in order to carry out its duties. Amundi has implemented a robust control plan, supported by internal and external systems and tools for monitoring and identifying criminal activities for Amundi clients. All issues are immediately escalated to the AML Officer and to the Head of Compliance.

- to monitor all transactions with substantial amounts or of an unusual or complex nature.

  Amundi has designed and implemented effective control systems to monitor and detect the risks of money laundering and financing of terrorism. Monitoring of transactions is carried out in accordance with the Amundi control plan.

- to provide anti-money laundering and anti-terrorism financing training on a periodic basis

  All new Amundi employees are required to undertake mandatory AML/CFT/international sanctions trainings as part of the Amundi Training program. Training is carried out via dedicated E-Learning courses all employees are required to complete. Amundi also requires all staff to adhere to the Compliance Manual which contains the Anti-Bribery Corruption ("ABC") guidance

notes. All staff is required to complete annual declaration that they remain familiar with Amundi's Compliance Manual.

- The AML Officer undergoes the same training as other staff; in addition he/she may attend specific seminars/courses that may arise. As part of an AML Officer's duty, she/he must keep up to date with international developments and industry guidance on anti-money laundering, counter-financing terrorism and financial security.
- to keep KYC records for at least five years after the termination of the business relationship.
- to prohibit conducting business with shell banks
  Amundi policies and procedures prohibit Amundi entering into relationship with a shell bank.
- to file suspicious transactions reports with the applicable Financial Intelligence Unit.
  The AML Officer is responsible for filing all suspicious transaction reports to the relevant Financial Intelligence Unit.

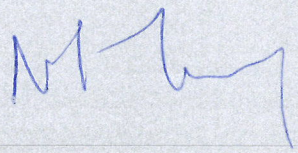
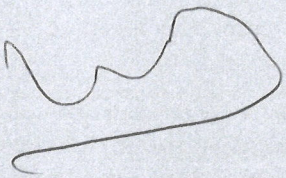
Amundi continuously monitors and enhances the effectiveness of its compliance standards and controls.

This policy is issued for information purposes only and shall not create any legally binding obligations on Amundi

4. Declaration of conformity

The undersigned, based on his/her best knowledge and belief, certify the above referenced questions were answered considering the existing internal controls of Amundi's anti-money laundering and anti-terrorism financing controls and financial services activities.

Authorized signatories:

Authorized signature		
Name	Nicolas CALCOEN	Marc NOEL
Title	Deputy CEO	Head of Compliance
Place	Paris	Paris
Date (DD/MM/YYYY)	27/01/2026	21/01/2026