

CALYON MONEY LAUNDERING PREVENTION

Calyon S.A. has established a control system for the prevention of money laundering and terrorism financing and for the enforcement of embargo and freezing of assets. This conforms with international rules and the provision of laws and regulations in force, and also Credit Agricole S.A. group policy. The system concerns the central entity as well as the affiliated units.

CALYON, as a credit and financial institution, is subject to the control of the "Commission Bancaire" and the "Autorité des Marchés Financiers", French regulators of banking and financial institutions.

The system, which has been set up, includes, on one hand, the obligations resulting from international rules and regulations and, on the other hand, those set up by the French domestic laws and regulations.

International obligations as follows :

- The 40 Financial Action Task Force (FATF) recommendations issued on February 1990, adapted and revised on June 2003, aiming to prevent the use of the international financial system for the purpose of laundering proceeds from criminal activities (see : <http://www.fatf-gafi.org>) ;
- The 9 Financial Action Task Force (FATF) recommendations issued on November 2001 and up-dated on October 22, 2004 aiming to prevent terrorism financing (see : <http://www.fatf-gafi.org>) ;
- The European Union directive dated from October 25, 2005 and August 1st 2006 aiming to harmonise the EU members provisions (see : <http://www.eur-lex.europa.eu>).

National obligations

The national obligations are set out in the Code Monétaire et Financier (Title VI) and are related to :

- requiring identification of customers when entering into business relations, particularly when opening banking or saving accounts or when offering safe custody facilities (KYC policy),
- collecting information related to complex and unusual operations or operations without economical justification or linked to illicit operations,
- keeping for use as evidence all copies of all documents collected for identification purpose or for transactions justification,
- abstention from entering into a business relationship or refusal to execute any operation for which it was not possible to obtain relevant or acceptable information,
- suspicious transaction reporting or mandatory reporting to Tracfin, the French F.I.U. (Financial Intelligence Unit) (see : <http://www.finances.gouv.fr>)

CALYON S.A.

A group directive defines the organization and the obligations of a financial security business line dedicated to the control and management of the risks related to money laundering, terrorism financing, embargoes and freezing of assets.

This business line is a part of the compliance control program set up by the Credit Agricole group. The business line is responsible for :

- setting up and control of policies and procedures,
- definition of rules for entering into a business relationship (Know Your Customer Policy),
- setting up tools for transaction filtering and account monitoring,
- handling of unusual and suspicious transactions,
- planning and tracking of training actions,
- direct reporting line to the board in case of non compliant situations.

Each unit of the group has appointed a financial security officer in charge of setting up locally the group rules and complying with local regulations.

Each operation business line is bound to apply the financial security directive and to establish dedicated procedures adapted to its activities.