




Financial Institution Name:
Location (Country):

EDF Trading Ltd
United Kingdom

| No # | Question | Answer |
|--|---|---|
| 1. ENTITY & OWNERSHIP | | |
| 1 | Full Legal name | EDF Trading Limited |
| 2 | Append a list of foreign branches which are covered by this questionnaire | EDF Trading Limited - Czech Branch, Slovak Branch, Romanian Branch & Slovenian Branch EDF Trading Markets Limited EDF Trading Markets Limited - Paris Branch EDF Trading (Switzerland) AG + |
| 3 | Full Legal (Registered) Address | 80 Victoria Street, Cardinal Place, 3rd Floor, London, SW1E 5JL |
| 4 | Full Primary Business Address (if different from above) | |
| 5 | Date of Entity incorporation/establishment | 10/01/2000 |
| 6 | Select type of ownership and append an ownership chart if available | |
| 6 a | Publicly Traded (25% of shares publicly traded) | No |
| 6 a1 | If Y, indicate the exchange traded on and ticker symbol | |
| 6 b | Member Owned/Mutual | No |
| 6 c | Government or State Owned by 25% or more | Yes |
| 6 d | Privately Owned | No |
| 6 d1 | If Y, provide details of shareholders or ultimate beneficial owners with a holding of 10% or more | |
| 7 | % of the Entity's total shares composed of bearer shares | |
| 8 | Does the Entity, or any of its branches, operate under an Offshore Banking License (OBL) ? | No |
| 8 a | If Y, provide the name of the relevant branch/es which operate under an OBL | |
| 9 | Does the Bank have a Virtual Bank License or provide services only through online channels? | No |
| 10 | Provide Legal Entity Identifier (LEI) if available | SN633FGTWNZOZMOJY680 |
| 2. AML, CTF & SANCTIONS PROGRAMME | | |
| 11 | Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: | |
| 11 a | Appointed Officer with sufficient experience/expertise | Yes |
| 11 b | Adverse Information Screening | Yes |
| 11 c | Beneficial Ownership | Yes |
| 11 d | Cash Reporting | Not Applicable |
| 11 e | CDD | Yes |
| 11 f | EDD | Yes |

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| 11 g | Independent Testing | Yes |
| 11 h | Periodic Review | Yes |
| 11 i | Policies and Procedures | Yes |
| 11 j | PEP Screening | Yes |
| 11 k | Risk Assessment | Yes |
| 11 l | Sanctions | Yes |
| 11 m | Suspicious Activity Reporting | Yes |
| 11 n | Training and Education | Yes |
| 11 o | Transaction Monitoring | Yes |
| 12 | Is the Entity's AML, CTF & Sanctions policy approved at least annually by the Board or equivalent Senior Management Committee? | Yes |
| 13 | Does the Entity use third parties to carry out any components of its AML, CTF & Sanctions programme? | Yes |
| 13 a | If Y, provide further details | Compliance Catalyst - for screening on Politically Exposed Persons (PEPs), State Owned Enterprises (SOEs) and adverse media. |
| 14 | Does the entity have a whistleblower policy? | Yes |
| 3. ANTI BRIBERY & CORRUPTION | | |
| 15 | Has the Entity documented policies and procedures consistent with applicable ABC regulations and requirements to reasonably prevent, detect and report bribery and corruption? | Yes |
| 16 | Does the Entity's internal audit function or other independent third party cover ABC Policies and Procedures? | Yes |
| 17 | Does the Entity provide mandatory ABC training to: | |
| 17 a | Board and Senior Committee Management | Yes |
| 17 b | 1st Line of Defence | Yes |
| 17 c | 2nd Line of Defence | Yes |
| 17 d | 3rd Line of Defence | Yes |
| 17 e | Third parties to which specific compliance activities subject to ABC risk have been outsourced | Not applicable |
| 17 f | Non-employed workers as appropriate (contractors/consultants) | Yes |
| 4. AML, CTF & SANCTIONS POLICIES & PROCEDURES | | |
| 18 | Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: | |
| 18 a | Money laundering | Yes |
| 18 b | Terrorist financing | Yes |
| 18 c | Sanctions violations | Yes |
| 19 | Does the Entity have policies and procedures that: | |
| 19 a | Prohibit the opening and keeping of anonymous and fictitious named accounts | No |
| 19 b | Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs | No |
| 19 c | Prohibit dealing with other entities that provide banking services to unlicensed banks | No |
| 19 d | Prohibit accounts/relationships with shell banks | No |
| 19 e | Prohibit dealing with another Entity that provides services to shell banks | No |
| 19 f | Prohibit opening and keeping of accounts for Section 311 designated entities | No |
| 19 g | Prohibit opening and keeping of accounts for any of unlicensed/unregulated remittance agents, exchanges houses, casa de cambio, bureaux de change or money transfer agents | No |
| 19 h | Assess the risks of relationships with domestic and foreign PEPs, including their family and close associates | Yes |
| 19 i | Define the process for escalating financial crime risk issues/potentially suspicious activity identified by employees | Yes |
| 19 j | Outline the processes regarding screening for sanctions, PEPs and Adverse Media/Negative News | Yes |

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| 20 | Has the Entity defined a risk tolerance statement or similar document which defines a risk boundary around their business? | Yes |
| 21 | Does the Entity have record retention procedures that comply with applicable laws? | Yes |
| 21 a | If Y, what is the retention period? | 5 years or more |
| 5. KYC, CDD and EDD | | |
| 22 | Does the Entity verify the identity of the customer? | Yes |
| 23 | Do the Entity's policies and procedures set out when CDD must be completed, e.g. at the time of onboarding or within 30 days? | Yes |
| 24 | Which of the following does the Entity gather and retain when conducting CDD? Select all that apply: | |
| 24 a | Customer identification | Yes |
| 24 b | Expected activity | Yes |
| 24 c | Nature of business/employment | Yes |
| 24 d | Ownership structure | Yes |
| 24 e | Product usage | Yes |
| 24 f | Purpose and nature of relationship | Yes |
| 24 g | Source of funds | Yes |
| 24 h | Source of wealth | Yes |
| 25 | Are each of the following identified: | |
| 25 a | Ultimate beneficial ownership | Yes |
| 25 a1 | Are ultimate beneficial owners verified? | Yes |
| 25 b | Authorised signatories (where applicable) | Yes |
| 25 c | Key controllers | Yes |
| 25 d | Other relevant parties | Yes |
| 26 | Does the due diligence process result in customers receiving a risk classification? | Yes |
| 27 | Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs? | Yes |
| 28 | Does the Entity have policies, procedures and processes to review and escalate potential matches from screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs? | Yes |
| 29 | Is KYC renewed at defined frequencies based on risk rating (Periodic Reviews)? | Yes |
| 29 a | If yes, select all that apply: | |
| 29 a1 | Less than one year | No |
| 29 a2 | 1 – 2 years | Yes |
| 29 a3 | 3 – 4 years | Yes |
| 29 a4 | 5 years or more | Yes |
| 29 a5 | Trigger-based or perpetual monitoring reviews | Yes |
| 29 a6 | Other (please specify) | Monitoring and checking of alerts which  |
| 30 | From the list below, which categories of customers or industries are subject to EDD and/or are restricted, or prohibited by the Entity's FCC programme? | |
| 30 a | Arms, Defence, Military | EDD on risk-based approach |
| 30 b | Respondent Banks | Do not have this category of customer or industry |
| 30 b1 | If EDD or EDD & restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022? | No |
| 30 c | Embassies/Consulates | EDD on risk-based approach |
| 30 d | Extractive industries | EDD on risk-based approach |
| 30 e | Gambling customers | Do not have this category of customer or industry |
| 30 f | General Trading Companies | EDD on risk-based approach |
| 30 g | Marijuana-related Entities | Do not have this category of customer or industry |
| 30 h | MSB/MVTS customers | Do not have this category of customer or industry |
| 30 i | Non-account customers | EDD on risk-based approach |
| 30 j | Non-Government Organisations | Do not have this category of customer or industry |
| 30 k | Non-resident customers | EDD on risk-based approach |

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| 30 l | Nuclear power | EDD on risk-based approach |
| 30 m | Payment Service Providers | EDD on risk-based approach |
| 30 n | PEPs | EDD on risk-based approach |
| 30 o | PEP Close Associates | EDD on risk-based approach |
| 30 p | PEP Related | EDD on risk-based approach |
| 30 q | Precious metals and stones | EDD on risk-based approach |
| 30 r | Red light businesses/Adult entertainment | Do not have this category of customer or industry |
| 30 s | Regulated charities | Do not have this category of customer or industry |
| 30 t | Shell banks | Do not have this category of customer or industry |
| 30 u | Travel and Tour Companies | EDD on risk-based approach |
| 30 v | Unregulated charities | Do not have this category of customer or industry |
| 30 w | Used Car Dealers | Do not have this category of customer or industry |
| 30 x | Virtual Asset Service Providers | Do not have this category of customer or industry |
| 30 y | Other (specify) | |
| 31 | If restricted, provide details of the restriction | |
| 6. MONITORING & REPORTING | | |
| 32 | Does the Entity have risk based policies, procedures and monitoring processes for the identification and reporting of suspicious activity? | Yes |
| 33 | What is the method used by the Entity to monitor transactions for suspicious activities? | Automated |
| 33 a | If manual or combination selected, specify what type of transactions are monitored manually | |
| 34 | Does the Entity have regulatory requirements to report suspicious transactions? | Yes |
| 34 a | If Y, does the Entity have policies, procedures and processes to comply with suspicious transactions reporting requirements? | Yes |
| 35 | Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity? | Yes |
| 7. PAYMENT TRANSPARENCY | | |
| 36 | Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards? | Yes |
| 37 | Does the Entity have policies, procedures and processes to comply with and have controls in place to ensure compliance with: | |
| 37 a | FATF Recommendation 16 | Yes |
| 37 b | Local Regulations | Yes |
| 37 b1 | If Y, Specify the regulation | Terrorism Act 2000 Proceeds of Crime Act 2002 (POCA) Counter-Terrorism Act 2008 Money Laundering Regulations 2017 Criminal Finance Act 2017 |
| 37 c | If N, explain | |
| 8. SANCTIONS | | |
| 38 | Does the Entity have a Sanctions Policy approved by management regarding compliance with sanctions law applicable to the Entity, including with respect to its business conducted with, or through accounts held at foreign financial institutions? | Yes |
| 39 | Does the Entity have policies, procedures or other controls reasonably designed to prohibit and/or detect actions taken to evade applicable sanctions prohibitions, such as stripping, or the resubmission and/or masking, of sanctions relevant information in cross border transactions? | Yes |

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| 40 | Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists? | Yes |
| 41 | Select the Sanctions Lists used by the Entity in its sanctions screening processes: | |
| 41 a | Consolidated United Nations Security Council Sanctions List (UN) | Used for screening customers and beneficial owners (i.e. reference data) |
| 41 b | United States Department of the Treasury's Office of Foreign Assets Control (OFAC) | Used for screening customers and beneficial owners (i.e. reference data) |
| 41 c | Office of Financial Sanctions Implementation HMT (OFSI) | Used for screening customers and beneficial owners (i.e. reference data) |
| 41 d | European Union Consolidated List (EU) | Used for screening customers and beneficial owners (i.e. reference data) |
| 41 e | Lists maintained by other G7 member countries | Used for screening customers and beneficial owners (i.e. reference data) |
| 41 f | Other (specify) | |
| 42 | Does the Entity have a physical presence, e.g. branches, subsidiaries, or representative offices located in countries/regions against which UN, OFAC, OFSI, EU or G7 member countries have enacted comprehensive jurisdiction-based Sanctions? | No |
| 9. TRAINING & EDUCATION | | |
| 43 | Does the Entity provide mandatory training, which includes: | |
| 43 a | Identification and reporting of transactions to government authorities | Yes |
| 43 b | Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered | Yes |
| 43 c | Internal policies for controlling money laundering, terrorist financing and sanctions violations | Yes |
| 43 d | New issues that occur in the market, e.g. significant regulatory actions or new regulations | Yes |
| 44 | Is the above mandatory training provided to : | |
| 44 a | Board and Senior Committee Management | Yes |
| 44 b | 1st Line of Defence | Yes |
| 44 c | 2nd Line of Defence | Yes |
| 44 d | 3rd Line of Defence | Yes |
| 44 e | Third parties to which specific FCC activities have been outsourced | Not Applicable |
| 44 f | Non-employed workers (contractors/consultants) | Yes |
| 10. AUDIT | | |
| 45 | In addition to inspections by the government supervisors/regulators, does the Entity have an internal audit function, a testing function or other independent third party, or both, that assesses FCC AML, CTF, ABC, Fraud and Sanctions policies and practices on a regular basis? | Yes |
| <p>Signature Page</p> <p>Wolfsberg Group Financial Crime Compliance Questionnaire 2023 (FCCQ V1.2)</p> <p>_____ (Financial Institution name)</p> <p>I, _____ (Senior Compliance Manager- Second Line representative), certify that I have read and understood this declaration, that the answers provided in this Wolfsberg FCCQ are complete and correct to my honest belief.</p> <p>_____ (Signature & Date)</p> | | |



EDF TRADING

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 Cardinal Place, 3rd floor
 London SW1E 5JL
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 F +44 (0)20 7061 5000

EDF Trading Limited Due Diligence (KYC) Information

| | |
|---|---|
| Full Legal Name & Trading Names (if applicable) | EDF Trading Limited |
| Date of Incorporation | 10/01/2000 |
| Registered Address | 80 Victoria Street, Cardinal Place 3rd Floor, London SW1E 5JL |
| Country | United Kingdom |
| Company Website | https://www.edftrading.com/ |
| Type of Organization (single owner, partnership, etc) | Private Limited Liability Company |
| Legal Entity Identifier (LEI) | SN633FGTWNSOZMOJY680 |
| VAT number | GB 735547907 |
| Registration Number | 3750288 |

1. SUPPORTING DOCUMENTS

The following supporting documents are available upon request:

- Certificate of Good Standing
- Memorandum and Articles of Association
- Last 2 years audited annual reports and financial statements

2. CONTACT DETAILS

Should you require any further information or clarifications, please contact:

Team: EDFT Compliance Team – Financial Crime

Email Address: rsc_fin_crime@edftrading.com

3. BANK DETAILS

| | |
|---------------------------|-------------------|
| Bank Name / Branch (City) | JP Morgan, London |
| Country of Bank Account | United Kingdom |
| Type of Currency | EUR |



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| Account Name | |
| Account Number | 76919581 |
| International Bank Account Number (IBAN) | GB71 CHAS 6092 4276 9195 81 |
| Sort Code (UK only) | |
| Routing Code (US only) | |

4. COMPANY INFORMATION

4.1 Details of company shareholders:

| Full Legal Name | Country of Incorporation | % Share Capital |
|-------------------|--------------------------|-----------------|
| EDF Holding S.A.S | France | 100% |

4.2 Ultimate Beneficial Owners (individuals):

| Full Legal Name | Nationality | DOB | Country of Residence | % Share Capital |
|-----------------|-------------|-----|----------------------|-----------------|
| Not applicable | | | | |

OR

4.3 Is the company a State-Owned Enterprise (SOE)?

Yes No

The ultimate beneficial owner of EDFT Ltd is EDF S.A, which is owned by the French Government.

4.4 Details of any current subsidiaries in which the company has controlling ownership (greater than 25%):

| Full Legal Name | Place of Incorporation | Total % Ownership |
|---|------------------------|-------------------|
| EDF Trading Markets Limited (FCA authorized agent and arranger) | United Kingdom | 100% |



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|------------------------------------|----------------|-------|
| EDF Trading Singapore Pte. Ltd | Singapore | 100% |
| EDF Trading Europe Limited | Ireland | 100% |
| EDF Trading Japan KK | Japan | 100% |
| EDF Trading Bioenergy Limited | United Kingdom | 100% |
| EDF Trading Electricidad Gas, S.L. | Spain | 100% |
| EDF Trading Polska SP.Z.OO | Poland | 100% |
| EDF Trading Switzerland AG | Switzerland | 100% |
| JERA Global Markets Pte. Ltd. | Singapore | 33.3% |
| EDF Inc (Delaware Corporation) | USA | 17.5% |

4.5 *Company Directors and Board of Executives:*

| Full Legal Name | Job Title / Position |
|---|----------------------|
| Marc BENAYOUN | Director |
| Beatrice BIGOIS | Director |
| Sylvie Catherine Marcelle BILLION | Director |
| Beatrice-Sophie Aude Diane-Aleth Marie Françoise BUFFON | Director |
| Xavier GIRRE | Director |
| Robert GUYLER | Director |
| Sabine LE GAC | Director |
| Stanislas Hugues Patrick Marie Foulques MARTIN | Director |
| Stephanie ROGER-SELWAN | Director |

4.6 *Are any of the Ultimate Beneficial Owners or Directors, a Politically Exposed Person (“PEP”), a family member of PEPs or known close associate of PEPs?*

Yes – Marc BENAYOUN; Béatrice BUFFON and Xavier GIRRE are PEPs because they are members of the executive committee of EDF S.A, which is majority owned by the French Government.

4.7 *What is the main business of the company?*



EDF TRADING

Wholesale commodities trading company, active in the electricity, natural gas, LPG, and environmental products markets, in both the physical and derivatives space, as well as risk management.

4.8 Will any third parties, intermediaries or sub-contractors be used for the purpose of our business relationship?

Yes No

5. SANCTIONS INFORMATION

5.1 Does the Company or one of our subsidiaries, directors & shareholders have any involvement with persons or entities sanctioned under current applicable sanctions programs (i.e. UN, EU, OFSI & OFAC)?

No

5.2 Does the Company have any subsidiaries in a country/territory that is under any current applicable sanctions programs?

No

5.3 Does the Company currently conduct business in any sanctioned countries?

No – EDFT Ltd does not conduct any business activity in the following countries: Iran, North Korea, Syria, Russia, Cuba, Crimea Region, Libya, Afghanistan, Sudan, South Sudan, Belarus, Iraq.

OWNERSHIP STRUCTURE

