Questionnaire LCB-FT

FDJ UNITED

I. General information about the activity and risk assessment

Risk Assessment

	Question	Answer
I - 1	The risk assessment takes account of the risk factors linked to the customers, countries or geographical zones, products, services, transactions and distribution channels.	YES
I - 2	The risk assessment is documented, kept up-to-date, and made available to the competent authorities.	YES
I - 3	Where applicable, the risk assessment integrates risk factors linked to the use of digital assets.	YES
I - 4	New products, new commercial practices, notably new distribution mechanisms, the use of new technologies or those under development, for new or pre-existing products, are the subject of a prior ML-TF risk analysis.	YES

II. Organisation of the AML-CFT mechanism

Procedures relative to AML-CFT

	Question	Answer
II - 5	The procedures cover all activities exposed to the risks of money laundering and terrorist financing.	YES
II - 6	The procedures cover all applicable AML-CFT obligations.	YES

	Question	Answer
II - 7	The procedures lay down the terms of record keeping of information and supporting documents collected as part of the KYC procedure, monitoring of the business relationship and the transactions, enhanced customer due diligence and thorough examinations.	YES

Information and Training

	Question	Answer
II - 8	All employees and equivalent staff are informed and trained regularly in the risk factors specific to AML-CFT.	YES
II - 9	A training system integrating AML-CFT and asset freezing is provided for the managing bodies.	YES

Governance

	Question	Answer
II - 10	A person responsible for overseeing compliance with AML-CFT obligations is appointed.	YES
II - 11	The person responsible for compliance with AML-CFT obligations informs the competent Financial Intelligence Unit (FIU) when he knows or suspects that funds derive from a criminal activity or are linked to terrorist financing.	YES
II - 12	The periodic reporting of ML-TF risk indicators is sent to the managing body.	YES

III. Internal control of the AML-CFT mechanism

Permanent Control

	Question	Answer
III - 13	A control mechanism making it possible to verify compliance with the AML-CFT legislation is put in place.	YES
III - 14	The permanent control verifies the due diligence undertaken within the framework of: ◆ Business relationships identified as high risk. ◆ Products, services and distribution channels considered to be high risk.	YES
III - 15	The permanent control ensures: ◆ Updating of the KYC elements during business relationships at a frequency commensurate with the risks. ◆ The appropriate processing of ML-TF alerts. ◆ Compliance with reporting obligations.	YES

Periodic Control

	Question	Answer
III - 16	The periodic control verifies: ◆ The relevance of the ML-TF risk assessment. ◆ Consistency between the ML-TF risk assessment and the internal AML-CFT procedures. ◆ The efficacy and effectiveness of the mechanism for detection and analysis of atypical transactions, including the relevance of the significance thresholds and criteria. ◆ That transactions having to give rise to a suspicious activity report are detected and declared to the FIU.	YES

Outsourcing in AML-CFT matters

	Question	Answer
III - 17	The mechanism relies on the use of external service providers for the implementation, in the name and on behalf of FDJ, of operational activities linked to the AML-CFT obligations.	YES
III - 18	The use of third parties based in high risk third countries is prohibited.	YES
III - 19	The mechanism provides for control of compliance with the procedures relative to AML-CFT obligations implemented by the external service provider.	YES

IV. Group approach

Organisation of the AML-CFT mechanism within the group

	Question	Answer
IV - 20	A person responsible for implementation of the anti-money laundering and terrorist financing mechanism is appointed at group level.	YES
IV - 21	The person responsible for implementation of the group mechanism oversees that the entities of the group consistently apply the procedures defined by the parent company.	YES
IV - 22	The person responsible for implementing the group mechanism is able to monitor and assess the effective implementation of actions aiming to remedy the significant failures raised by the permanent or periodic control of the AML-CFT mechanism of the entities of the group.	YES
IV - 23	A mechanism for identification and assessment of the risks of money laundering and terrorist financing is put in place at group level.	YES
IV - 24	The group procedures organise the sharing of information within the group for the purposes of organisation of AMLCFT due diligences.	YES

V. Customer due diligence measures adapted to the ML-TF risks and detection of suspicious transactions

Obligations to identify the customer and the beneficial owner

	Question	Answer
V - 25	When it forms a business relationship, FDJ: ◆ Identifies and verifies the identity of the customer or the beneficial owner. ◆ Collects the KYC elements making it possible to draw up a profile of the business relationship. ◆ Terminates the business relationship when verification of identity of the customer or the beneficial owner is impossible.	YES
V - 26	When it executes an occasional transaction, FDJ: ◆ Identifies and verifies the identity of the customer when the amount of the transaction is equal to or greater than EUR 2,000, upon collection of winnings or commitment of a bet (betting and gaming services).	YES

Politically Exposed Persons

	Question	Answer
V - 27	The mechanism makes it possible to detect politically exposed persons : ◆ Upon commencement of the business relationship. ◆ During the business relationship.	YES
V - 28	The mechanism stipulates obtaining information about the origin of the funds and the assets of the PEPs.	YES
V - 29	The mechanism stipulates that the authorisation to form a business relationship with a politically exposed person is given by a member of the executive body.	YES

Enhanced customer due diligence measures

	Question	Answer
V - 30	Enhanced customer due diligence measures should be carried out : ◆ When the business relationship involves a politically exposed person. ◆ When the product or transaction is liable to favour anonymity. ◆ When the natural person or legal entity customer is based in a high risk third country. ◆ When the situation presents high ML-TF risks.	YES

Enhanced reviews

	Question	Answer
V - 31	An enhanced review is conducted: ◆ When a transaction is particularly complex. ◆ When a transaction presents an unusually high amount. ◆ When a transaction does not seem to have economic justification or a legal purpose.	YES
V - 32	All elements collected within the framework of enhanced reviews are kept for the applicable legal period.	YES

Reporting Obligations

	Question	Answer
V - 33	A report is sent to the competent FIU in case of suspicion that the transactions derive from an offence punishable by a prison sentence of over one year or that they are linked to terrorist financing.	YES
V - 34	The report of suspicious activity comprises the elements of analysis which led to reporting of the transactions accompanied by any document useful to their interpretation.	YES
V - 35	The procedures contain provisions relative to the confidentiality of the existence, the content and the follow-up to a report of suspicious activity.	YES

VI. Asset freezing and restrictive measures

	Question	Answer
VI - 36	The mechanism makes it possible to detect persons subject of an asset freezing measure: ◆ Upon entering into the business relationship ◆ During the business relationship	YES
VI - 37	The mechanism makes it possible to implement freezing measures as soon as they take effect.	YES

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