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Caisse des dépôts et consignations ("Caisse des Dépôts")

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Name of the Institution :
Caisse des dépôts et consignations

Address of the Institution's Head Office:
56 rue de Lille
75007 PARIS
FRANCE

Website of the Institution:
www.caissedesdepots.fr (french version)
www.caissedesdepots.fr/en (english version)

Contact details regarding this questionnaire :

Deputy head of legal affairs and compliance
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A - GENERAL INFORMATION ABOUT CAISSE DES DEPÔTS

1. Identification information

FULL LEGAL ENTITY NAME : Caisse des dépôts et consignations
LISTS OF AUTHORIZED SIGNATORIES : latest lists can be found here.
ANNUAL REPORTS: latest reports can be found here.

LEI CODE:	COUNTRY OF TAX RESIDENCE:	VAT REGISTERED:
969500Q2PFTTP0Y5QL44	FRANCE	FR 77 180 020 026

SIREN:	NIC:	SIRET:
180.020.026	00019	180 020 026 00019

FOREIGN TIN

180 020 026

2. Classification information

EMIR (European markets infra-structure regulation):

CDC is an entity out of scope for EMIR under the exemption of article 1(5)b regarding public sector entities:

With the exception of the reporting obligation under Article 9, this Regulation shall not apply to the following entities:

- *public sector entities within the meaning of point (18) of Article 4 of Directive 2006/48/EC where they are owned by central governments and have explicit guarantee arrangements provided by central governments.*

MIFID (markets in financial instruments directive):

Regarding MIFID regulation, CDC is:

- *categorized as a **professional client per se / by nature**;*
- *an out of scope client for the purpose of receiving research within the framework of MIFIDII (article 13).*

3. Status, governance and organization of the Caisse des dépôts et consignations (CDC) are governed by articles L.518-2 et seq and R.518-1 et seq of the French monetary and financial Code

Article L.518-2 of the French monetary and financial Code:

"The Caisse des dépôts et consignations and its subsidiaries constitute a public group in the service of the country's general interest and economic development. Said group fulfils public interest duties in support of the public policies pursued by the State and the local authorities and may engage in competitive activities.
The Caisse des dépôts et consignations is a special institution responsible for the administration of deposits and consignments, the provision of services relating to the funds whose management has been entrusted to it, and the performance of other similar duties which are legally delegated to it. It is responsible for the protection popular savings, the financing of social housing and the management of pension schemes. It also contributes to local and national economic development, particularly in the spheres of employment, urban policy, combating exclusion from banking and finance, company startups and sustainable development.
The Caisse des dépôts et consignations is a long-term investor and contributes, consistent with its proprietary interests, to the development of companies.
The Caisse des dépôts et consignations is placed, in the most exceptional manner, under the supervision and guarantee of the legislative authorities. It is organised as determined in a decree issued following consultation with the Conseil d'Etat on a proposal from the Supervisory Commission (Commission de Surveillance)."

4. Is the institution accredited by a regulatory authority ?

☐ **YES** ☒ **NO**

Caisse des Dépôts, because of its *sui generis* legal status provided by law, is not accredited by a regulatory authority. However, Caisse des Dépôts is placed under the supervision of the "**Autorité de Contrôle Prudentiel et de Résolution**[1]", in accordance with article L.518-15-2 of the French Monetary and Financial Code, with regard to accounting, prudential and internal control requirements, including compliance with anti-money laundering and counter financing of terrorism regulation (articles L.561-2 1° and L.561-36-1 of the French monetary and financial Code).

Caisse des Dépôts is subject to the legislation relating to the fight against money laundering and the financing of terrorism pursuant to **1°) of Article L.561-2 of the French monetary and financial Code**.

5. Is the institution registered as a Digital Asset Service Provider (DASP) ?

☒ OUI ☐ NON

Caisse des Dépôts has been registered since September 28, 2021 (under number E2021-023) with the Autorité des Marchés Financiers (AMF) as a **Digital Asset Service Provider (DASP)** pursuant to article L. 54-10-3 of the French Monetary and Financial Code (CMF) in respect of the digital asset custody service (Cf. the white list of registered PSANs available on the AMF website).

Additional details:

- **CDC has no articles of association or certificate of incorporation ;**
- **CDC is not approved by a regulatory authority due to its specific status provided by law ;**
- **CDC is exempted specifically from the requirement of bearing a banking license, under article 2 of the CRD directive and under article L.518-1 of the French monetary and financial Code ;**
- **CDC is registered as a DASP with the AMF**

6. List of members of board of directors/supervisory board and identification of politically exposed persons (PEPs) :

Caisse des Dépôts is placed, in the most special way, under the supervision and guarantee of the legislative authority (article L.518-2 of the Monetary and Financial Code). It is supervised by the Supervisory Commission (article L.518-7 of the Monetary and Financial Code).

In accordance with the provisions of the Order of 17 March 2023 establishing the list of politically exposed national positions pursuant to article R.561-18 of the French monetary and financial Code, the members of the Supervisory Board of CDC are not considered as PEPs in respect of their role in the governance of CDC.

They may, however, be considered as PEPs for a different professional/personal statutory reason (e.g. Member of Parliament or Senator, State Councillor, member of the Board of Directors of public company, etc.).

First name and last name	*Nationality*	*Date of birth*	*Function/Title*	*PEPs in respect of their role in the governance of CDC*
Jean-René CAZENEUVE	French	09/06/1958	*Member of the National Assembly, appointed by the President of the National Assembly*	☐ **YES** ☒ **NO**
Estelle MERCIER	French	15/06/1973	*Member of the National Assembly, appointed by the President of the National Assembly*	☐ **YES** ☒ **NO**

[1] ACPR : French authority responsible for supervising the banking and insurance sectors.

First name and last name	*Nationality*	*Date of birth*	*Function/Title*	*PEPs in respect of their role in the governance of CDC*
Marie LEBEC	French	17/12/1990	*Member of the National Assembly, appointed by the President of the National Assembly*	☐ **YES** ☒ **NO**
Jean-François HUSSON	French	17/04/1961	Senator of Meurthe-et-Moselle district	☐ **YES** ☒ **NO**
Viviane ARTIGALAS	French	22/10/1956	Senator of Hautes-Pyrénées district	☐ **YES** ☒ **NO**
Pierre ALLEGRET	French	09/12/1987	Assistant Director of Trésor executive management, Chief Executive Director representative at Trésor	☐ **YES** ☒ **NO**
Emmanuelle AURIOL	French	05/12/1966	Qualified personality, appointed by the President of the National Assembly	☐ **YES** ☒ **NO**
Denis DUVERNE	French	31/10/1953	Qualified personality appointed by the President of the National Assembly	☐ **YES** ☒ **NO**
Lucie MUNIESA	French	22/02/1975	Qualified person, appointed by the President of the National Assembly	☐ **YES** ☒ **NO**
Evelyne RATTE	French	15/03/1951	President of Chamber, Court of State Auditors (Cour des Comptes) a qualified person appointed by the President of the Senate	☐ **YES** ☒ **NO**
Jérôme BASCHER	French	31/05/1973	Qualified person, appointed by the President of the Senate	☐ **YES** ☒ **NO**
Marie-Claire CAPOBIANCO	French	28/09/1957	Qualified personality appointed by the French State	☐ **YES** ☒ **NO**
Jean-Marc JANAILLAC	French	26/04/1953	Qualified personality appointed by the French State	☐ **YES** ☒ **NO**
Marc LE FUR	French	28/11/1956	Qualified personality appointed by the French State	☐ **YES** ☒ **NO**
Estelle LE BIHAN-CHAUVIN	French	13/06/1971	Employee representative of Caisse des Dépôts	☐ **YES** ☒ **NO**
David BLE	French	29/11/1972	Employee representative of Caisse des Dépôts	☐ **YES** ☒ **NO**

7. Chief Executive Officer of Caisse des Dépôts Group:

First name and last name	Nationality	*Date of birth*	*Function/Title*	*PEP in respect of their role in the governance of CDC*
Olivier SICHEL	French	30/04/1967	**Chief Executive Officer of Caisse des Dépôts Group**	☐ **YES** ☒ **NO**

Additional details:

- **CDC does not provide identity card or passport of its CEO ;**
- **Appointment decree of Olivier SICHEL by the President of the French Republic can be found here.**

8. List of members of the Executive committee and directors of the Institution:

In accordance with the provisions of the Order of 17 March 2023 establishing the list of politically exposed national positions pursuant to article R.561-18 of the French monetary and financial Code, the members of the Executive committee of CDC are not considered as PEPs in respect of their role in the governance of CDC.

They may, however, be considered as PEPs for a different professional/personal statutory reason (e.g. State Councillor, member of the Board of Directors of public company, Member of Parliament or Senator etc.).

First name and last name	*Nationality*	*Date of birth*	*Function/Title*	*PEPs in respect of their role in the governance of CDC*
Olivier SICHEL	French	30/04/1967	Chief Executive Officer of Caisse des Dépôts	☐ **YES** ☒ **NO**
Julie-Agathe BAKALOWICZ	French	04/01/1976	Director of the Office of the Director-General	☐ **YES** ☒ **NO**
Virginie CHAPRON-DU-JEU	French	13/10/1961	Director of Risk Management	☐ **YES** ☒ **NO**
Pierre CHEVALIER	French	16/10/1967	Director of Legal Affairs, Compliance and Ethics	☐ **YES** ☒ **NO**
Nicolas DUFOURCQ	French	18/07/1963	Chief Executive Officer of Bpifrance	☐ **YES** ☒ **NO**
Audrey GIRARD	French	14/09/1975	Director of Strategic Investments	☐ **YES** ☒ **NO**
Marianne KERMOAL-BERTHOME	French	12/05/1978	Director of Social Policy	☐ **YES** ☒ **NO**
Olivier MAREUSE	French	24/10/1963	Deputy Chief Executive Officer - Director of Asset Management and Savings Funds	☐ **YES** ☒ **NO**
Catherine MAYENOBE	French	13/10/1964	Deputy General Director - Director of Operations and Business Transformation Management	☐ **YES** ☒ **NO**
Sophie QUATREHOMME	French	16/10/1976	Director of Communications, Corporate Sponsorship and Partnerships	☐ **YES** ☒ **NO**
Aurélie ROBINEAU-ISRAEL	French	02/03/1974	Director of Human Resources	☐ **YES** ☒ **NO**
Antoine SAINTOYANT	French	28/08/1977	Deputy Chief Executive Officer - Director of Banque des Territoires	☐ **YES** ☒ **NO**
Nathalie TUBIANA	French	24/10/1967	Director of Finance and Sustainable Development Policy	☐ **YES** ☒ **NO**

9. Ownership of the Caisse des Depôts :

Name (first, last name and date of birth for natural persons)	*% of capital held (> 5%)*	*Nationality*
The Caisse des Dépôts is not owned by any natural or legal person (see specific status stated above)		

Additional details:

Without ownership and controlling shareholders, Olivier SICHEL is considered to be the only beneficial owner as legal representative.

10. Main activities of your institution:

☐ *Private Banking*
☐ *Commercial banking operations*
☐ *Financial advice*
☐ *Asset management*
☐ *Insurance*
☒ *Other:* Administration of consignments and regulated deposits (e.g. deposits of legal professions, inactive accounts and unclaimed life insurance contracts), management of pension schemes, financing of public policies (social housing, urban policy, sustainable development, employment, etc.), long-term investments, development of companies, etc. CDC's customer base is French. For further information, see the annual report.

11. Is your Institution or its mother company listed on any stock exchange?

☐ **YES** ☒ **NO**

12. Does the Institution conduct financial transactions in one of the following countries, or conduct transactions for which asset managers or funds are incorporated in one of the following countries?

- Jurisdictions subject to a Financial Action Task Force (FATF) call on its members and other jurisdictions to apply countermeasures to protect the international financial system from the on-going and substantial money laundering and terrorist financing risks emanating from these jurisdictions	☐ **YES** ☒ **NO**
- Jurisdictions with strategic AML/CFT deficiencies according to the FAFT	☐ **YES** ☒ **NO**
- Jurisdictions listed on the French or European Union (EU) list of non-cooperative countries and territories.	☐ **YES** ☒ **NO**
- With any country listed by the OFAC	☐ **YES** ☒ **NO**
- With any country on the United Nations, EU or French economic and financial sanctions lists	☐ **YES** ☒ **NO**

B – ANTI-MONEY LAUNDERING AND COUNTER FINANCING OF TERRORISM :

1. Has your country implemented an anti-money laundering and combating the financing of terrorism legislation that complies with FATF international standards?

☒ **YES** ☐ **NO**

Please detail the references texts applicable:

Articles L.561-2 et seq and R.561-1 et seq of the French monetary and financial Code.

2. Has the Institution or any of its directors or board members been sanctioned for violations of AML/CFT regulation?

☐ **YES** ☒ **NO**

3. Has your Institution set up AML/CFT policies and procedures consistent with applicable AML and CTF regulations and requirements?

☒ **YES** ☐ **NO**

if yes: Last update: January 2026

4. Are the above-mentioned policies and procedures applicable to all your branches and subsidiaries, both local and international?

☒ **YES** ☐ **NO**

5. Do your AML/CFT policies and procedures prevent you from investing in assets domiciled in countries listed on FATF 1 and listed on the EU list of non-cooperative jurisdictions?

☒ **YES** ☐ **NO**

6. Is your AML/CFT program approved by the board of directors/supervisory board or management committee of your Institution?

☒ **YES** ☐ **NO**

7. If so, does this committee receive regular reporting on this AML/CFT program?

☒ **YES** ☐ **NO**

8. Has your Institution appointed a person in charge of the AML/CFT system?

☒ **YES** ☐ **NO**

If yes, please detail the following:

- *Name:* **Pierre Chevalier**
- *Function:* **Director of Legal Affairs, Compliance and Ethics of Caisse des Dépôts Group**.

- *Contact:* Pierre.chevalier@caissedesdepots.fr - conformite@caissedesdepots.fr

9. Has your Institution appointed an internal auditor who regularly assesses AML/CFT procedures and practices for your Institution, your branches and your subsidiaries?

☒ **YES** ☐ **NO**

10. Has your Institution appointed an external auditor or another third party who regularly assesses AML/CFT procedures, practices, systems and controls for your Institution, your branches and your subsidiaries?

☒ **YES** ☐ **NO**

If yes, please indicate if the report concluded to:

☒ Compliance with the applicable AML/CFT provisions;

☐ Some breaches have been detected (if yes, please provide details or send extracts of the report)

11. Does the Institution provide AML/CFT training to its employees?

☒ **YES** ☐ **NO**

***If yes, please detail if*:**

- These training programs illustrate laundering techniques specific to products and transactions offered by your Institution	☒ **YES** ☐ **NO**
- These training programs describe the internal procedures to prevent money laundering and terrorism financing	☒ **YES** ☐ **NO**
- Your Institution keeps records of training sessions including attendance records and training materials used	☒ **YES** ☐ **NO**
- Your Institution has procedures that enable it to communicate to relevant employees new AML/CFT laws and changes to existing procedures and practices	☒ **YES** ☐ **NO**

➔ CLIENTS DUE DILIGENCE AND KNOW YOUR CUSTUMER (KYC) POLICIES

12. Has your Institution implemented processes for the identification of its clients/counterparties consistent with AML and CFT regulation?

☒ **YES** ☐ **NO**

13. Please mention if your KYCs policies and procedures contain the following provisions:

- Customer identification and verification	☒ **YES** ☐ **NO**
- Ultimate beneficial ownership identification and verification	☒ **YES** ☐ **NO**
- Origin of funds of your customer ?	☒ **YES** ☐ **NO**
- Does the KYC due diligence process result in a risk profile for customer?	☒ **YES** ☐ **NO**
If yes, what factors are used to determine the customer's risk profile? *Select all that apply:* - *Products and customer transactions* - *Geography* - *Client's activity* - *Type of legal entity* - *Adverse information*	☒ **YES** ☐ **NO** ☒ **YES** ☐ **NO** ☒ **YES** ☐ **NO** ☒ **YES** ☐ **NO** ☒ **YES** ☐ **NO**
- Review and, where appropriate, update of clients/counterparties information on a regular basis?	☒ **YES** ☐ **NO**
- An assessment of the transactions depending on the profiles identified beforehand throughout the business relationship.	☒ **YES** ☐ **NO**

- *Identification of PEP (Politically Exposed Person) customers, their relatives and close associates (RCA) and PEP beneficial owner(s) ?*	☒ **YES** ☐ **NO**
- *Screening for sanctions?*	☒ **YES** ☐ **NO**
- *Screening for negative media?*	☒ **YES** ☐ **NO**
- *Records on business relationship? If your answer is yes, for how long*: 5 years after the end of the business relationship	☒ **YES** ☐ **NO**

➔ DETECTION OF SUSPICIOUS TRANSACTIONS AND REPORTING TO COMPETENT AUTHORITIES

14. Name of the competent authority to whom suspicious transactions and activities reports are sent?

☒ **TRACFIN** (Financial intelligence agency attached to the French Ministry of Economy and Finance)

☐ Not applicable.

15. Does the Institution have policies for the identification and reporting of transactions that are required to be reported to the competent authorities?

☒ **YES** ☐ **Not applicable (please, detail):**

16. Does the Institution have a monitoring program of unusual and potentially suspicious activities that covers funds transfers and monetary instruments (such as travellers checks, money orders, etc.)?

☒ **YES** ☐ **Not applicable (please, detail):**

17. Does the Institution have procedures to ensure reasonably that it only operates with correspondent banks that possess licenses to operate in their countries of origin?

☒ **YES** ☐ **Not applicable (please, detail):**

18. Does the Institution have procedures that specify escalation processes for financial crime risk issues and for terminating existing customers relationships due to financial crime risk?

☒ **YES** ☐ **Not applicable (please, detail):**

19. Does the Institution have implemented a system to detect entities or individuals listed on the following lists:

☒ French official embargoes lists
☒ European Union council official lists
☒ United Nations Security Council lists
☒ US Treasury (OFAC) Lists
☒ UK Sanctions Lists

C – ANTI-BRIBERY & CORRUPTION (ABC)

Due to its specific status, CDC is not subject to Article 17 of the "Sapin 2" anticorruption french law. However, in its capacity as a trusted third party meeting the highest standards, CDC has implemented comprehensive anti bribery and corruption management system and policies.

1. Has the Establishment implemented anti-corruption policies and/or procedures consistent with applicable regulations and requirements to prevent, detect and report bribery and corruption?

☒ **YES** ☐ **NO**

2. Is your ABC program approved by the board of directors/supervisory board or management committee of your Institution?

☒ **YES** ☐ **NO**

3. And if so, does this committee receive regular reporting on this ABC program?

☒ **YES** ☐ **NO**

4. **Has the Institution adopted a code of ethics incorporating standards of conduct in the fight against corruption and trading in influence?**

   ☒ **YES** ☐ **NO**

5. **If so, does the institution have a comprehensive policy that prohibits the giving and receiving of bribes? This includes promising, offering, donating, soliciting, or receiving anything of value, directly or indirectly, to influence action or gain advantage.**

   ☒ **YES** ☐ **NO**

6. **Do you have a disciplinary system in force allowing to sanction the employees of the company in the event of violation of your code?**

   ☒ **YES** ☐ **NO**

7. **Are the organization, its leaders and beneficiaries accused or suspected of corruption?**

   ☐ **YES** ☒ **NO**

8. **Does the establishment have a procedure for preventing and dealing with conflicts of interest?**

   ☒ **YES** ☐ **NO**

9. **Has the Establishment set up an internal alert system to collect signals from employees regarding corruption?**

   ☒ **YES** ☐ **NO**

10. **Does the Institution conduct a corruption risk assessment by business sector and geographic area related to your activities?**

    ☒ **YES** ☐ **NO**

11. **Is an internal control and evaluation system for the measures implemented operational?**

    ☒ **YES** ☐ **NO**

12. **Have you implemented 1st, 2nd and 3rd level internal or external accounting control procedures, intended to ensure that your books, registers and accounts are not used to mask acts of corruption or influence peddling?**

    ☒ **YES** ☐ **NO**

13. **Does the establishment, as part of an equity investment, take into account the risk of corruption associated with the country?**

    ☒ **YES** ☐ **NO**

14. **Does the establishment deploy an anti-corruption training device intended for the most exposed executives and personnel?**

    ☒ **YES** ☐ **NO**

I CERTIFY THAT ALL THE INFORMATION PROVIDED IN THE CAISSE DES DEPOTS ET CONSIGNATIONS QUESTIONNAIRE IS CORRECT.

Name and title of authorised signatory: **WAEL RIZK**

DEPUTY HEAD OF LEGAL AFFAIRS AND COMPLIANCE

Authorised signature:

Wael RIZK
CAISSE DES DÉPÔTS ET CONSIGNATIONS
Signé électroniquement le 20/11/2026 10:14:14