

ALUBAF ARAB INTERNATIONAL BANK B.S.C ©
Due Diligence Report & Anti Money
Laundering Questionnaire

GENERAL INFORMATION

Institution Name:	ALUBAF Arab International Bank (Bahrain) B.S.C. (c)
Legal Form:	Stock Holding Company Closed
Regulator Body:	Central Bank of Bahrain (CBB)
Website:	www.cbb.gov.bh
License Type:	Wholesale Bank (Conventional)
Banking License Number:	WB/01
Commercial Registration No.	12819
FATCA Member Type:	PFFI (Participating Foreign Institution)
GIIN Number	EH5Xw2.00007.ME.048
SWIFT Code:	ALUBBHBM
Registered Address:	Alubaf Tower, Building 854, Road 3618, Block 436, Al Seef District, Manama - Kingdom of Bahrain
Postal Address:	P.O Box: 11529 - Manama - Kingdom of Bahrain
Contact Details:	Telephone Number: (+) 973 17517722 Fax Number: (+) 973 17540094 E-mail: info@alubafbank.com Website: www.alubafbank.com
Name of External Auditors:	Ernst & Young
Name of Major Shareholders	Libyan Foreign Bank- Libya 99.50% National Bank of Yemen- Yemen 0.28% Yemen Bank for Reconstruction & Development- Yemen 0.22%
Business Activities	Treasury, Trade Finance, Loan Facilities



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Board of Directors	Names	Nationality
Chairman	Mr. Khaled AlGonsel	Libyan
Deputy Chairman	Mr. Anthony Constantine Mallis	Australian
Director	Mr. Abdul Kareem Bucheeri	Bahraini
Director	Mr. Giuma Masaud Salem Kordi	Libyan
Director	Mr. Tarek Amer	Egyptian
Director	Mr. Abdurazag Tarhuni	Libyan
Director	Mr. Khaled KH Hussin Tahir	Libyan
Senior Management	Names	Nationality
Chief Executive Officer (CEO)	Mr. Hasan K. Abulhasan	Libyan
Head of Financial Control	Ms. Juhaina Albahrani	Bahraini
Head of Operations	Ms. Fatima Mohamed Bu Ali	Bahraini
Head of Internal Audit	Mr. Abbas Abdulla Al-Shamma	Bahraini
Head of Compliance, MLRO and Board Secretary	Ms. Najla Mahmood Qambar	Bahraini
Head of Business Development	Mr. Kemal El-Abyad	Turkish
Acting Head of IT	Mr. Aymen Alkordi	Libyan
Head of Treasury	Mr. Othman Shwaimat	Jordanian
Head of Trade Finance	Mr. Hussain Haidar	Bahraini
Head of Risk Management	Mr. Sumegh Borkar	Indian
Head of Human Resources and Administration	Mr. Amer AlSheaibani	Bahraini
Manager – Credit Management	Mr. Mohammed Ahmed	Bahraini
ALUBAF Arab International Bank - Representative Office		
Örnek Mah.Finans Çıkmazı Sk.No: 4 Kat: 3rd Istanbul Republic of Turkey Tel:+902164727283 Fax:+902164727284		



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OWNERSHIP STRUCTURE OF THE BANK

Name	Nationality	No. of Shares	%
Libyan Foreign Bank	Libyan	4,975,008	99.5
National Bank of Yemen	Yemeni	13,768	0.28
Yemen Bank for Reconstructions and Development	Yemeni	11,224	0.22



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DESIGNATED OFFICIALS RESPONSIBLE FOR AML

Money Laundering Reporting Officer (MLRO)

Name	Ms. Najla Mahmood Qambar
Telephone #	(+) 973 17517864
Fax #	(+) 973 17580577
Email	najla.mahmood@alubafbank.com
Website	http://www.alubafbank.com

Deputy Money Laundering Reporting Officer (DMLRO)

Name	Ms. Sindhu Balasubramanian
Telephone #	(+) 973 17517480
Fax #	(+) 973 17580577
Email	Sindhu.B@alubafbank.com
Website	http://www.alubafbank.com



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AML POLICY STATEMENT

Background

ALUBAF Arab International Bank (Bahrain) B.S.C. (C) ("ALUBAF") is a closed Bahraini joint stock company incorporated in the Kingdom of Bahrain and registered with the Ministry of Industry and Commerce under Commercial Registration (CR) number 12819. The bank operates under a wholesale banking license issued by the Central Bank of Bahrain (CBB) under license number WB/01.

Anti-Money Laundering Regulations

The Kingdom of Bahrain's Decree Law No.4 of 2001 is the primary legislation relevant to prevention and prohibition of the money laundering and combating the financing of terrorism. The regulation implemented by the CBB is in compliance with the Financial Action Task Force (FATF). The Financial Crime regulations demonstrated the FATF Recommendations on money laundering and terrorism financing provide the most widely recognized standards. The Kingdom of Bahrain's legislation relevant to AML/CFT can be accessed on the CBB website "www.cbb.gov.bh".

Anti-Money Laundering Policy

ALUBAF Bank's anti money laundering (AML) policy is intended to ensure that the Bank has a comprehensive framework of policies and procedures including best practice standards for combating money laundering and terrorist financing. The policies and procedures are anticipated to prevent the Bank's operations activities from being used by others for unlawful purposes.

The bank's policy prohibits and actively prevents money laundering and any activity that facilitate money laundering or funding of terrorist or criminal activities by complying with the AML laws and regulations of the jurisdiction in which it undertakes business activities and as per compliance program.

Customer Due Diligence

ALUBAF Bank would not establish a new business relationship or provide financial services until appropriate customer due diligence (CDD) are taken and recorded by obtaining counterparty identity documents. The KYC documents and information are required to be obtained prior to commencing the relationship in order to obtain sufficient information related the counterparty and satisfied that the customer and their business are legitimate and the Bank is not at risk of financial loss or a damaged reputation.

Reporting of Suspicious Circumstances



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Any suspicious circumstances surrounding the opening or operation of any account must be reported immediately to the Money Laundering Reporting Officer (MLRO) using the suspicious Transaction Internal Report for validation by MLRO and reporting to an appropriate authority. It is the responsibility of all members of the management and staff to report any suspicious transactions to the MLRO, as part of their duty to help prevent money laundering.

Retention of Records

The bank will keep adequate records and identification documents for at least five years from the end of the bank's relationship with the customer or from the date when the transaction was completed.

Training

The Bank is committed to provide periodic training and information to ensure that all affected employees are aware of their responsibilities under the AML law and CBB regulation. The bank provides up to date AML training for relevant staff that is appropriate to the bank's activities and its differing types of customers.

We hereby certify that the Bank's policy and procedures are reviewed, approved and audited on an annual basis. All Bank staff are aware of these procedures, strictly adhered, and adequate compliance supervision processes are implemented. We are committed to adopt the international standards on Anti Money Laundering and Combating Financing Terrorism, in our endeavors to be compliant with these standards.

Sanctions Policy

ALUBAF is committed to comply with sanctions programs issued by the United Nations (UN), Office of Foreign Asset Control (OFAC) of the United States, The Office of Financial Sanctions, Implementation (OFSI) under Her Majesty's Treasury of the United Kingdom, European Union (EU), and local sanction programs. In that context, the Bank is committed to prevent, detect and where applicable report any dealings with sanctioned persons.



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Due Diligence & Anti Money Laundering
Questionnaire:

1	Country Assessment	Yes	No
1.1	Is Money Laundering a criminal offence? (<i>Money Laundering is defined as the process by which the proceeds of crime are converted into assets including Bank or other deposits, so that they may be retained permanently or used to fund further crimes</i>).	√	
1.2	Are there specific laws and/or regulations in place covering Anti Money Laundering and Counter Terrorist Financing? "Decree Law No.4 of 2001: With respect to the prevention and prohibition of Money Laundering"	√	
1.3	Do the regulations require FIs to have effective controls in place to prevent and identify the proceeds of crime being laundered through their systems?	√	
1.4	Are these laws and/or regulations in line with FATF Recommendations?	√	
1.5	Is your country identified by FATF as a Cooperative Country?	√	
1.6	Do the laws and regulations in your jurisdiction limit or prohibit the opening or maintenance of anonymous or numbered accounts?	√	
1.7	Does the Bank have a policy prohibiting accounts/relationships with shell banks? (<i>A shell bank is defined as a bank incorporated in a jurisdiction in which it has no physical presence and which is unaffiliated with regulated financial group</i>)	√	
2	AML Policy	Yes	No
2.1	Does the AML policy program require Board of Directors or senior management approval?	√	
2.2	Does the Bank have a legal and regulatory compliance program that includes a designated officer that is responsible officer for coordinating and overseeing AML framework? If yes, please provide contact details of your Compliance Officer/MLRO: Name: Ms. Najla Mahmood Qambar E-mail: najla.mahmood@alubafbank.com Phone Number: (+) 973 17517864 Fax: (+) 973 17580577	√	
2.3	Does the Bank have a formal/independent anti-money laundering compliance function?	√	
2.4	Does the Bank have policies or practices for the identification and reporting of transactions that are required to be reported to the authorities?	√	
2.5	In addition to inspections by the government supervisors/regulators, does the FI client have an internal audit function or other independent third party that assesses AML policies and on regular basis?	√	
2.6	Does the FI have policies covering relationships with politically Exposed Persons (PEP's), their family and close associates?	√	
2.7	Does your compliance program include established policies, procedure and processes for managing Economic and Trade Sanctions?	√	
3	Know Your Customer (KYC) / Customer Due Diligence	Yes	No
3.1	Does the Bank conduct KYC due diligence for all clients on boarding?	√	



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3.2	Does the Bank have a requirement to collect information regarding its customer's business activities?	√	
3.3	Does the Bank have procedures to establish a record for each customer noting their respective identification documents and 'Know Your Customer'?	√	
3.4	Does the Bank screen customers and transactions against lists of persons, entities or countries issued by government/competent authorities?	√	
3.5	Does the Bank have a process to review and, where appropriate, update customer information?	√	
3.6	Does the Bank complete a risk-based assessment to understand the normal and expected transaction of its customers?	√	
3.7	Has the Bank implemented processes for the identification and verification of those customers on whose behalf it maintain or operates accounts or conducts transactions?	√	
4	Risk Assessment	Yes	No
4.1	Does the Bank have a risk-based assessment of its customer base and their transactions?	√	
4.2	Does the Bank determine the appropriate level of enhanced due diligence necessary for those categories of customers and transactions that you have reason to believe pose a heightened risk of illicit activities at or through the FI?	√	
4.3	Does the Bank have an appropriate record retention procedure pursuant to the applicable law? <i>Five Years</i>	√	
5	Transaction Monitoring	Yes	No
5.1	Does the Bank have a monitoring program for unusual and potentially suspicious activity that covers funds transfers?	√	
5.2	Does the Bank have a risk-based assessment of its customer base and their transactions?	√	
6	Sanctions Screening	Yes	No
6.1	Does your Bank check existing and prospective customers and monitor all transactions against UN,US or EU sanctions and/or other applicable official lists of suspected terrorist and terrorist organizations?	√	
6.2	Does your country maintain a list of individuals and entities suspected of terrorist activities and/or under financial measures (OFAC, UN, etc.)?	√	
6.3	Do you provide directly or indirectly services for customers under UN, US or EU sanctions?		√
7	Training & Awareness	Yes	No
7.1	Does the Bank provide AML training to relevant employees that includes: <ul style="list-style-type: none"> Identification and reporting of transactions that must be reported to government authorities. Examples of different forms of money laundering involving the Banks products and services. Internal policies to prevent money laundering. 	√	

The undersigned, confirm that the information provided in this questionnaire is up to date and accurately reflected our institution's AML/CTF policies



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Signature:	
Name: Najla Mahmood Qambar	
Title: Head of Compliance, MLRO and Board Secretary	
Date: 24 th February 2025	
Bank Stamp:	