


## Wolfsberg AML Certification

**Financial Institution Name:** Arab Bank plc., on behalf of each of branches and subsidiaries (as listed below)

<b>Anti-Money Laundering Questionnaire</b>		
If you answer "no" to any question, additional information can be supplied at the end of the questionnaire.		
<b>I. General AML Policies, Practices and Procedures:</b>	<b>Yes</b>	<b>No</b>
1. Is the AML compliance program approved by the FI's board or a senior committee?	YES	
2. Does the FI have a legal and regulatory compliance program that includes a designated officer that is responsible for coordinating and overseeing the AML framework?	YES	
3. Has the FI developed written policies documenting the processes that they have in place to prevent, detect and report suspicious transactions?	YES	
4. 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 practices on a regular basis?	YES	
5. Does the FI have a policy prohibiting accounts/relationships with shell banks? (A shell bank is defined as a bank incorporated in a jurisdiction in which it has no physical presence and which is unaffiliated with a regulated financial group.)	YES	
6. Does the FI have policies to reasonably ensure that they will not conduct transactions with or on behalf of shell banks through any of its accounts or products?	YES	
7. Does the FI have policies covering relationships with Politically Exposed Persons (PEP's), their family and close associates?	YES	
8. Does the FI have record retention procedures that comply with applicable law?	YES	
9. Are the FI's AML policies and practices being applied to all branches and subsidiaries of the FI both in the home country and in locations outside of that jurisdiction?	YES Please refer to addendum "A"	
<b>II. Risk Assessment</b>	<b>Yes</b>	<b>No</b>
10. Does the FI have a risk-based assessment of its customer base and their transactions?	YES	
11. Does the FI determine the appropriate level of enhanced due diligence necessary for those categories of customers and transactions that the FI has reason to believe pose a heightened risk of illicit activities at or through the FI?	YES	
<b>III. Know Your Customer, Due Diligence and Enhanced Due Diligence</b>	<b>Yes</b>	<b>No</b>
12. Has the FI implemented processes for the identification of those customers on whose behalf it maintains or operates accounts or conducts transactions?	YES	
13. Does the FI have a requirement to collect information regarding its customers' business activities?	YES	
14. Does the FI assess its FI customers' AML policies or practices?	YES	
15. Does the FI have a process to review and, where appropriate, update customer information relating to high risk client information?	YES	
16. Does the FI have procedures to establish a record for each new customer noting their respective identification documents and 'Know Your Customer' information?	YES	
17. Does the FI complete a risk-based assessment to understand the normal and expected transactions of its customers?	YES	

<b>IV. Reportable Transactions and Prevention and Detection of Transactions with Illegally Obtained Funds</b>	<b>Yes</b>	<b>No</b>
18. Does the FI have policies or practices for the identification and reporting of transactions that are required to be reported to the authorities?	<b>YES</b>	
19. Where cash transaction reporting is mandatory, does the FI have procedures to identify transactions structured to avoid such obligations?	<b>YES</b>	
20. Does the FI screen customers and transactions against lists of persons, entities or countries issued by government/competent authorities?	<b>YES</b>	
21. Does the FI have policies to reasonably ensure that it only operates with correspondent banks that possess licenses to operate in their countries of origin?	<b>YES</b>	
22. Does the FI adhere to the Wolfsberg Transparency Principles and the appropriate usage of the SWIFT MT 202/202COV and MT 205/205COV message formats?	<b>YES</b>	
<b>V. Transaction Monitoring</b>	<b>Yes</b>	<b>No</b>
23. Does the FI have a monitoring program for unusual and potentially suspicious activity that covers funds transfers and monetary instruments such as travelers checks, money orders, etc?	<b>YES</b>	
<b>VI. AML Training</b>	<b>Yes</b>	<b>No</b>
24. Does the FI provide AML training to relevant employees that includes: <ul style="list-style-type: none"> <li>▪ Identification and reporting of transactions that must be reported to government authorities.</li> <li>▪ Examples of different forms of money laundering involving the FI's products and services.</li> <li>▪ Internal policies to prevent money laundering.</li> </ul>	<b>YES</b>	
25. Does the FI retain records of its training sessions including attendance records and relevant training materials used?	<b>YES</b>	
26. Does the FI communicate new AML related laws or changes to existing AML related policies or practices to relevant employees?	<b>YES</b>	
27. Does the FI employ third parties to carry out some of the functions of the FI?	<b>NO</b>	
28. If the answer to question 27 is yes, does the FI provide AML training to relevant third parties that includes: <ul style="list-style-type: none"> <li>▪ Identification and reporting of transactions that must be reported to government authorities.</li> <li>▪ Examples of different forms of money laundering involving the FI's products and services.</li> <li>▪ Internal policies to prevent money laundering.</li> </ul>	<b>N/A</b>	

<b>Name</b>	<b>Mohammed M. Dabbour</b>
<b>Title</b>	<b>SVP &amp; Director of Regulatory Compliance</b>
<b>Signature</b>	
<b>Date</b>	<b>October 28, 2019</b>

Wolfsberg AML Certification Applicable to the Following Arab Bank Plc. Branches and Subsidiaries

Entity Name	Type	Country	Main Address	Key Local Regulator(s)	Key Local Regulator(s) Website(s)
Arab Bank	Head Office and Jordan Branches	Jordan	Prince Shaker Bin Zeid St. Shmeissani, Amman - Jordan	Central Bank of Jordan	<a href="http://www.cbj.gov.jo/">http://www.cbj.gov.jo/</a>
Arab Bank	Branch	Algeria	15 Al-Sa'ada Street, Shabani Haidara Valley , Algeria	Bank of Algeria	<a href="http://www.bank-of-algeria.dz/">http://www.bank-of-algeria.dz/</a>
Arab Bank	Branch (Retail and Wholesale)	Bahrain	Building No. 540 Road 1706 - Block 317 Diplomatic Area, Manama - Bahrain	Central Bank of Bahrain	<a href="http://www.cbb.gov.bh/home.php">http://www.cbb.gov.bh/home.php</a>
Arab Bank	Branch	Egypt	46 Gamet El Dowl El Arabia St. Al-Mohandesseen - Al Giza Cairo, Egypt	Central Bank of Egypt	<a href="http://www.cbe.org.eg/">http://www.cbe.org.eg/</a>
Arab Bank	Branch	Lebanon	Riad El Solh Square Banks St. BCD- Beirut - Lebanon	Banque du Liban (Central Bank of Lebanon)	<a href="http://www.bdl.gov.lb/">http://www.bdl.gov.lb/</a>
Arab Bank	Branch	Morocco	174 Mohamed V Street, Casablanca - Morocco	Bank Al-Maghrib (Central Bank of Morocco)	<a href="http://www.bkam.ma/">http://www.bkam.ma/</a>
Arab Bank	Branch	Palestine	Grand Park Hotel Street Al Masyoon – Ramallah - Palestine	Palestine Monetary Authority	<a href="http://www.pma.ps/">http://www.pma.ps/</a>
Arab Bank	Branch	Qatar	Grand Hammed Area 119 Avenue - Doha	Qatar Central Bank	<a href="http://www.qcb.gov.qa/English/Pages/default.aspx">http://www.qcb.gov.qa/English/Pages/default.aspx</a>
Arab Bank	Branch	Singapore	No. 3 Fraser Street, #10-21 DUO Tower, Singapore 189352	Monetary Authority of Singapore	<a href="http://www.mas.gov.sg/">http://www.mas.gov.sg/</a>
Arab Bank	Branch	UAE	Imaar Square, Building # 2, Dubai - UAE	Central Bank of UAE	<a href="http://www.centralbank.ae/index.php">http://www.centralbank.ae/index.php</a>

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Arab Bank	Branch	Yemen	Zubairi Str. , Sana'a - Yemen	Central Bank of Yemen	<a href="http://www.centralbank.gov.ye/">http://www.centralbank.gov.ye/</a>
Arab Bank	Branch	China	R4505 & 4506, 45/F, Phase II, Shanghai International Financial Center, No. 8 Century Avenue, China (Shanghai) Pilot Free Trade Zone	People's Bank of China	<a href="http://www.pbc.gov.cn">http://www.pbc.gov.cn</a>
Arab Bank Australia Ltd	Wholly Owned Subsidiary	Australia	Level 7, 20 Bridge Street, Sydney NSW 2000 - Australia	Reserve Bank of Australia Australian Prudential Regulation Authority	<a href="http://www.rba.gov.au/">http://www.rba.gov.au/</a> <a href="http://www.apra.gov.au/">http://www.apra.gov.au/</a>
Islamic International Arab Bank	Wholly Owned Subsidiary	Jordan	Wasfi Al Tal St., Building no. 20 Amman - Jordan	Central Bank of Jordan	<a href="http://www.cbj.gov.jo/">http://www.cbj.gov.jo/</a>
Arab Tunisian Bank	Subsidiary	Tunisia	9 Rue Hadi Nouira - Tunis	Banque Centrale de Tunisie (Central Bank of Tunisia)	<a href="http://www.bct.gov.tn/bct/siteprod/francais/index1.jsp">http://www.bct.gov.tn/bct/siteprod/francais/index1.jsp</a>
Europe Arab Bank Plc	Wholly Owned Subsidiary	UK	13-15 Oorgate London EC2R 6AD - United Kingdom	Financial Conduct Authority Bank of England	<a href="http://www.fca.org.uk/">http://www.fca.org.uk/</a> <a href="http://www.bankofengland.co.uk/">http://www.bankofengland.co.uk/</a>
Arab Bank	Federal Agency	USA	Federal Agency - New York 150 East 52nd Street New York, NY 10022-4213	Office of the Comptroller of the Currency (OCC) NY Federal Reserve Bank	<a href="http://www.occ.treas.gov/">http://www.occ.treas.gov/</a> <a href="http://www.newyorkfed.org/">http://www.newyorkfed.org/</a>