

AL BARAKA GROUP B.S.C.
ANTIMONEY LAUNDERING QUESTIONNAIRE

PART [1] - OWNERSHIP STRUCTURE

1.	Registered Name of the Institution:	Al Baraka Group B.S.C.	
2.	Trading Name (if different):	Al Baraka Group B.S.C.	
3.	Registered at:	Ministry of Industry & Commerce, Kingdom of Bahrain	
4.	Registered Address:	Al Baraka Headquarters, Bahrain Bay Manama - Kingdom of Bahrain	
		Physical presence at this address?	YES
5.	Head Office Address:	Al Baraka Headquarters, Bahrain Bay P.O Box: 1882, Manama - Kingdom of Bahrain	
		Physical presence at this address?	YES
6.	List of exchanges:	Bahrain Bourse	Symbol : BARKA
7.	Name and Website of regulatory bodies	Name : Central Bank of Bahrain - Kingdom of Bahrain	
		Website: www.cbb.gov.bh	
8.	License No. & Date & Place Issued:	IBF-1/033, 22 March 2022 Bahrain	
9.	License Type:	Investment Business Firm - Category 1 (Islamic Principles)	
10.	Commercial Registration No. & Expiry	48915-1	
11.	FATCA GIIN	86IIBW.00000.LE.048	
12.	Name & address of External Auditor:	PwC, P.O. Box 60771, Manama, Bahrain.	
13.	SWIFT Address:	ABGBHBM	
14.	Name of Parent Company (if applicable):	N/A	
15.	Country of Incorporation of Parent Company:	N/A	
16.	No. of Subsidiaries	10 and 1 Representative Office	
17.	Are our shares publicly traded?	YES	
18.	Do we publish our latest financial statements annual and quarterly	YES	
19.	Do we publish our Director's dealings?	YES	
20.	Does our institution have a Corporate Code of Ethics? (Director's Handbook)	YES	

PART [2] - MANAGEMENT & COMPOSITION OF SHAREHOLDERS

1) OWNERSHIP INFORMATION - MAIN SHAREHOLDERS

List of main shareholders owning 5% or more of the issued capital of our institution:

Name	Ownership Interest (percentage)	Nature of ownership (direct / indirect)
Shaikh Saleh Abdulla Kamel (Transfer under process to Dallah Al Baraka Holding co.)	30.11%	Direct
Dallah Al Baraka Holding Company	24.64%	Direct
Al Tawfeek Company for Investment Funds	19.32%	Direct
Abdulla Abdulaziz Saleh Al Rajhi	7.03%	Direct

2) MANAGEMENT STRUCTURE - BOARD OF DIRECTORS & TOP MANAGEMENT

Board of Directors:

Name	Designation	Nationality
Mr. Abdullah Saleh Kamel	Chairman	Saudi
Mr. Mohammed Ibrahim Al Shroogi	Vice Chairman	Bahraini
Dr. Jihad Al Nakla	Board Member	British
Dr. Khalid Abdullah Ateeq	Board Member	Bahraini
Mr. Housseem Ben Haj Amor	Board Member & Group Chief Executive Officer	Tunisian
Mr. Abdul Ellah Sabbahi	Board Member	Saudi
Mrs. Dalia Hazem Khorshid	Board Member	Egyptian
Dr. Ziad Ahmed Bahaaeldin	Board Member	Egyptian
Mr. Saud Saleh Al Saleh	Board Member	Saudi
Prof. Mohamed Chiekh Rouhou	Board Member	Tunisian
Mr. Naser Mohamed Al Nuwais	Board Member	Emirati
Mr. Fahad Abdulla A. Al-Rajhi	Board Member	Saudi
Mr. Tawfig Shaker Mufti	Board Member	Saudi

Management:

Name	Designation	Nationality
Mr. Housseem Ben Haj Amor	Group Chief Executive Officer	Tunisian
Mr. Azhar Aziz Dogar	Senior Vice President - Head of Credit and Risk Management	Pakistani
Mr. Mohammed Al-Alawi	Senior Vice President - Head of Internal Audit	Bahraini
Mr. Suhail Tohami	Senior Vice President - Head of Treasury, Investments & Financial Institutions	Bahraini
Dr. Mohamed Mustapha Khemira	Senior Vice President, Head of Strategic Planning	Tunisian
Mr. Abdul Malek Mezher	Senior Vice President - Group Head of Compliance, Governance & Board Affairs and MLRO	Jordanian
Mr. Mohammed Abdul Latif Al-Mahmood	First Vice President - Head of Internal Sharia Audit	Bahraini
Mr. Ali Asgar Mandasorwala	First Vice President -Head of Finance	Indian
Mr. Fouad Janahi	First Vice President - Acting Head of Operations and Administration	Bahraini
Dr. Eltigani El Tayeb Mohammed	Vice President Sharia Officer, Secretary of the Unified Sharia Board	Sudanese

PART [3] - GENERAL AML POLICIES, PRACTICES & PROCEDURES

I	GENERAL ISSUES	YES	NO
1.a	Has our country established laws/regulations concerning Anti-Money Laundering (AML) and Combating the Financing of Terrorism (CFT)	✓	
1.b	Are money laundering and financing of terrorism considered as crimes in our country (territory)?	✓	
2. a	Is our institution subject to such laws/regulations?	✓	
2. b	Does our supervisory authority carry out supervision with special regard to the prevention of AML & CFT?	✓	
2. c	Is our country a member of FATF?	✓	
2. d	Has our country been evaluated by FATF?	✓	
II	AML/CFT POLICIES & PROCEDURES	YES	NO
3. a	Does our AML compliance program require approval of our Board of Directors or a senior committee thereof?	✓	
3. b	Has our institution established and implemented an AML/CFT compliance program and related procedures?	✓	
4.	Are our policies / procedures compliant with local laws & regulations with regard to AML / CFT?	✓	
5.	Are our policies / procedures compliant with the Financial Action Task Force's (40+9) Recommendations?	✓	
6.	Does our institution have a legal and regulatory compliance program that includes a designated officer who is responsible for coordinating and overseeing the AML/CFT framework?	✓	
7.	Would we provide with a copy of our policies if requested by others?	✓ (Only on reciprocal basis)	
8.	Are the AML/CFT policies and procedures applicable to our head office also applied to our majority owned subsidiaries (both local and overseas)? If 'No' please give / attach details of any units that are excluded:	✓	
9.	Does our policy require us to: a) Verify the true identity of all customers prior to entering into a business relationship / undertaking any transactions? b) Verify the identity of underlying beneficial owners, if any? c) Verify the source of wealth / funds and the level of economic activity of our customers? d) Apply enhanced customer due diligence on those customers identified as having a higher risk profile? e) Periodically update due diligence information obtained? f) Review the AML/CFT controls of respondent banks before opening an account for them?	 ✓ ✓ ✓ ✓ ✓ ✓	
10.	Do our policies and procedures permit us to open or maintain anonymous accounts?		✓
11.	Do our policies and procedures permit us to conduct business with Shell banks, i.e., banks which maintain no physical presence in the country of their incorporation (except if a subsidiary of a regulated financial group)?		✓

12.	Does our institution have policies covering relationships with Politically Exposed Persons (PEP's), their families and close associates?	✓	
III	RISK ASSESSMENT	YES	NO
13.	Does our institution conduct risk-based assessment of our customers and their transactions?	✓	
14.	Does our institution determine the appropriate level of enhanced due diligence necessary for those categories of customers and transactions that we have reasons to believe pose a heightened risk of illicit activities at or through the institution?	✓	
IV	KNOW YOUR CUSTOMER, DUE DILIGENCE AND ENHANCED DUE DILIGENCE	YES	NO
15.	Do we retain copies of all relevant customer Identity Documents and transactions information?	✓ 5 Years	
16.	Are any third parties (e.g., 'payable through' accounts) allowed direct access to the account?		✓
17.	Does our institution deal with walk-in customers?		✓
18.	Has our institution implemented systems for the identification of customers, including customer information in the case of recorded transactions, account opening, etc.	✓	
19.	Has our institution implemented processes for the identification of those customers on whose behalf it maintains or operates accounts or conducts transactions?	✓	
20.	Does our institution have a process to review and, where appropriate, update customer information relating to high-risk client information?	✓	
21.	Does our institution comply with FATF Special Recommendations VII and ensure that full originator information is included in all payments that it makes?	✓	
V	TRANSACTION MONITORING	YES	NO
22.	Does our institution have procedures for identifying payments / transactions related to persons / entities (appearing in relevant regulatory lists) suspected of terrorism? If 'yes' are these automated or manual?	✓ manual	
23.	Are we permitted by our local regulations to share relevant customer identification data with our correspondents should this be requested?		✓
24.	If 'yes', would we be willing to do so if required by others where a legitimate need has arisen?	N/A	
25.	Does our institution have an established audit and / or compliance review function to test the adequacy of compliance with our AML / CFT policies and procedures?	✓	
26.	Does the regulatory body / competent authority in our country conduct AML / CFT reviews of our institution.	✓	
27.	Are we in compliance in all material respects with all relevant AML / CFT laws and regulations?	✓	
28.	Has our institution been subject to any investigation, indictment, conviction or civil enforcement related to money laundering and terrorism financing in the past five years?		✓

VI	REPORTABLE TRANSACTIONS AND PREVENTION AND DETECTION OF TRANSACTIONS WITH ILLEGALLY OBTAINED FUNDS	YES	NO
29.	Does our institution have a monitoring program for unusual and potentially suspicious activity that covers funds transfers and monetary instruments?	✓	
30.	Where cash transaction reporting is mandatory, does our institution have procedures to identify transactions structured to avoid such obligations?	N/A	
31.	Does our institution screen customers and transactions against lists of persons, entities or countries issued by government/competent authorities?	✓	
VII	AML TRAINING	YES	NO
32.	Does our institution have an established employee training program for all employees about money laundering and to assist them in identifying suspicious transactions? If 'yes' with what frequency is training required?	✓ Every year	
33.	Does our institution retain records of its training sessions including attendance records & AML undertaken?	✓	
34.	Does our institution offer AML e-learning courses?	✓	
35.	Does our institution offers face to face & class training?	✓	
36.	Does our institution employ third parties to carry out some of the functions of our institution?	✓	
VIII	CORRESPONDENT BANKING RELATIONSHIP	YES	NO
37.	Have any of our correspondent banks originated from certain jurisdictions such as Non-Cooperative countries and territories and countries sanctioned by the United Nations.		✓
38.	Has our institution established any procedures regarding the ongoing monitoring of activities conducted through such correspondent accounts?	N/A	



PART [4] - MLRO & Compliance Officer's Details

Our institution's Compliance Officer & Anti Money Laundering Reporting Officer (MLRO)'s details:

Name:	Mr. Abdul Malek Mezher	Phone:	+973 17541122 Ext:204
Title:	Senior Vice President - Group Head of Compliance, Governance & Board Affairs and MLRO	E-Mail:	amezher@albaraka.com
Address:	P.O. Box 1882, Al Baraka Headquarters, Bahrain Bay Manama - Kingdom of Bahrain	Fax:	17536533
Signature:		Date:	