

# 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. Closed	
2.	Trading Name (if different):	Al Baraka Group B.S.C. Closed	
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 - Kingd	om of Bahrain
		Physical presence at this address?	YES
6.	List of exchanges:	None	Symbol: N/A
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:	АВВСВНВМ	
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 your shares publicly traded?	No	
18.	Does your institution publish your latest financial statements and quarterly	YES	
19.	Does your institution publish your director's dealings?	YES	
20.	Does your institution have a Corporate Code of Ethics? (Director's Handbook)	YES	



#### PART [2] - MANAGEMENT & COMPOSITION OF SHAREHOLDERS

# 1) OWNERSHIP INFORMATION - MAIN SHAREHOLDERS

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

Name	Ownership Interest (As of 31/12/2024)	Nature of ownership (direct / indirect)
Dallah Al Baraka Holding Company	63.15%	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:**

No	Name	Designation	Nationality
1	Mr. Abdullah Saleh Kamel	Chairman	Saudi
2	Mr. Mohammed Ibrahim Al Shroogi	Vice Chairman	Bahraini
3	Mr. Masood Ahmed Al Bastaki	Board Member	Bahraini
4	Dr. Khalid Abdullah Ateeq	Board Member	Bahraini
5	Mr. Houssem Ben Haj Amor	Board Member & Group Chief Executive Officer	Tunisian
6	Mr. Abdul Ellah Sabbahi	Board Member	Saudi
7	Mrs. Dalia Hazem Khorshid	Board Member	Egyptian
8	Dr. Ziad Ahmed Bahaaeldin	Board Member	Egyptian
9	Mr. Saud Saleh Al Saleh	Board Member	Saudi
10	Mr. Naser Mohamed Al Nuwais	Board Member	Emirati
11	Mr. Fahed Ibrahim Al Mufarrij	Board Member	Saudi
12	Mr. Tawfig Shaker Mufti	Board Member	Saudi

#### **Executive Management:**

Name	Designation	Nationality
Mr. Houssem 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. Ali Asgar Mandasorwala	Senior Vice President -Head of Finance	Indian
Mr. Mohsin Dashti	Senior Vice President - Head of Operations & Support	Bahraini
Mr. Mohammed Abdul Latif Al- Mahmood	First Vice President - Head of Internal Sharia Audit	Bahraini
Dr. Eltigani El Tayeb Mohammed	Vice President Sharia Officer, Secretary of the Unified Sharia Board	Sudanese
Mr. Mohammed Jamsheer	Head of Information Technology	Bahraini

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

I	GENERAL ISSUES		NO
1.a	Has your 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 your institution subject to such laws/regulations?	✓	
2. b	Does your supervisory authority carry out supervision with special regard to the prevention of AML & CFT?	✓	
2. c	Is your country a member of MENAFATF?	✓	
2. d	Has your country been evaluated by FATF?	✓	
II	AML/CFT POLICIES & PROCEDURES	YES	NO
3. a	Does your AML compliance program require approval of our Board of Directors or a senior committee thereof?	✓	
3. b	Has your institution established and implemented an AML/CFT compliance program and related procedures?	✓	
4.	Are your policies / procedures compliant with local laws & regulations with regard to AML / CFT?	✓	
5.	Are your policies / procedures compliant with the Financial Action Task Force's (40+9) Recommendations?		
6.	Does your 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 your institution provide with a copy of your policies if requested by others?		
8.	Are the AML/CFT policies and procedures applicable to your head office also applied to your majority owned subsidiaries (both local and overseas)? If 'No' please give / attach details of any units that are excluded:	<b>√</b>	
9.	Does your policy require you to:  a) Verify the true identity of all customers prior to entering into a business relationship / undertaking any transactions?	<b>√</b>	
	<ul><li>b) Verify the identity of underlying beneficial owners, if any?</li><li>c) Verify the source of wealth / funds and the level of economic activity of our customers?</li></ul>	<b>√</b> ✓	
	d) Apply enhanced customer due diligence on those customers identified as having a higher risk profile?	✓	
	<ul><li>e) Periodically update due diligence information obtained?</li><li>f) Review the AML/CFT controls of respondent banks before opening an account for them?</li></ul>	<b>*</b>	
10.	Does your policies and procedures permit you to open or maintain anonymous accounts?		✓
11.	Does your policies and procedures permit your institution 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 your institution have policies covering relationships with Politically Exposed Persons (PEP's), their families and close associates?		
III	RISK ASSESSMENT		NO
13.	Does your institution conduct risk-based assessment of your customers and their transactions?		
14.	Does your 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.	Does your institution 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?		<b>√</b>
17.	Does your institution deal with walk-in customers?		✓
18.	Has your institution implemented systems for the identification of customers, including customer information in the case of recorded transactions, account opening, etc.?		
19.	Has your institution implemented processes for the identification of those customers on whose behalf it maintains or operates accounts or conducts transactions?		
20.	Does your institution have a process to review and, where appropriate, update customer information relating to high-risk client information?		
21.	Does your institution comply with FATF Special Recommendations VII and ensure that full originator information is included in all payments that it makes?		
٧	TRANSACTION MONITORING	YES	NO
22.	Does your 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?	√ Automa ted	
23.	Are you permitted by your local regulations to share relevant customer identification data with your correspondents should this be requested?		✓
24.	If 'yes', would your institution be willing to do so if required by others where alegitimate need has arisen?		
25.	Does your institution have an established audit and / or compliance review function to test the adequacy of compliance with your AML / CFT policies and procedures?		
26.	Does the regulatory body / competent authority in your country conduct AML / CFT reviews of your institution?	✓	
27.	Is your institution in compliance in all material respects with all relevant AML / CFTlaws and regulations?	✓	
28.	Has your 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		NO
29.	Does your institution have a monitoring program for unusual and potentially suspicious activity that covers funds transfers and monetary instruments?	<b>✓</b>	
30.	Where cash transaction reporting is mandatory, does your institution have procedures to identify transactions structured to avoid such obligations?	N/A	
31.	Does your institution screen customers and transactions against lists of persons, entities or countries issued by government/competent authorities?	<b>√</b>	
VII	SANCTION SCREENING	YES	NO
32.	Does your institution comply with the sanctions administered by U.S. Treasury Departments Office of Foreign Assets Control "OFAC", Her Majesty's Treasury "HMT, the Council of Commission of the European Union "the EU", or the United Nation Security Council "UNSC" or Sanctions Committee acting for UNSC?		
33.	Does your institution conduct or plan to conduct business activity in, or with counterparties in, an OFAC Comprehensively Sanctioned Country/Region, or with Sanctioned Parties?		<b>✓</b>
34.	Does your institution, including any majority-owned or otherwise controlled subsidiary, or affiliate, directly or indirectly, has a physical presence in an OFAC Comprehensively Sanctioned Country/Region?		<b>✓</b>
VIII	AML TRAINING	YES	NO
35.	Does your 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?		
36.	Does your institution retain records of its training sessions including attendance records & AML undertaken?		
37.	Does your institution offer AML e-learning courses?		
38.	Does your institution offer face to face & class training?		
IX	CORRESPONDENT BANKING RELATIONSHIP		NO
39.	Have any of your correspondent banks originated from certain jurisdictions such as Non-Cooperative countries and territories and countries sanctioned by the United Nations?		<b>√</b>
40.	Has your institution established any procedures regarding the ongoing monitoring of activities conducted through such correspondent accounts?		
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# 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