

The Commercial Bank of Kuwait (CBK)

The State of Kuwait

AML/KYC questionnaire

General Information

Name of the bank	The Commercial Bank of Kuwait
Country of incorporation	The State of Kuwait
Legal status	Kuwaiti Public Shareholding Company (K.P.S.C.)
Commercial registration number	7706
Banking license	Listed in banking register since 10/1/1970
Web site	www.cbk.com
Registered address	Al-Qibla, block5, Kuwait city, State of Kuwait
Mailing address	P. O. Box 2861 Safat 13029, Kuwait
Lines of business	Corporate lending, trade finance, Treasury, Retail banking, International banking.
Major shareholders	Refer to this link: http://www.kse.com.kw/A/Stock/Stock.aspx?Stk=103
Board of Directors	Please refer to this link http://www.cbk.com/en/about-cbk/board-of-directors/
Executive management	Please refer to this link http://www.cbk.com/en/about-cbk/executive-management/
CEO	Elham Mahfouz
AML officer in charge	Yaqoub Al Ebrahim GM- Compliance & Corporate Governance
Number of local branches	45
Number of foreign branches	Nil
Regulator	The Central Bank of Kuwait www.cbk.gov.kw
External auditors	Deloitte, Al-Fahad & Al-Wazzan & Co. Al-Bazie & Co. member in RSM International
Name of stock exchange the bank listed	Kuwait Stock Exchange www.kse.com.kw

AML questionnaire

I. General AML Policies, Practices and Procedures:	<u>Yes</u>	<u>No</u>
1. Is the AML compliance program approved by the bank's board or a senior committee?	YES	
2. Does the bank 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 bank 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 bank have an internal audit function or other independent third party that assesses AML policies and practices on a regular basis?	YES	
5. 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 a regulated financial group.)</i>	YES	
6. Does the bank 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 bank have policies covering relationships with Politically Exposed Persons (PEP's), their family and close associates?	YES	
8. Does the bank have record retention procedures that comply with applicable law?	YES	
9. Are the bank's AML policies and practices being applied to all branches and subsidiaries of the bank both in the home country and in locations outside of that jurisdiction?	YES	
II. Risk Assessment	<u>Yes</u>	<u>No</u>
10. Does the bank have a risk-based assessment of its customer base and their transactions?	YES	
11. Does the bank determine the appropriate level of enhanced due diligence necessary for those categories of customers and transactions that the bank has reason to believe pose a heightened risk of illicit activities at or through the bank?	YES	
III. Know Your Customer, Due Diligence and Enhanced Due Diligence	<u>Yes</u>	<u>No</u>
12. Has the bank implemented processes for the identification of those customers on whose behalf it maintains or operates accounts or conducts transactions?	YES	

13. Does the bank have a requirement to collect information regarding its customers' business activities?	YES	
14. Does the bank assess its customers' AML policies or practices?	YES	
15. Does the bank have a process to review and, where appropriate, update customer information relating to high risk client information?	YES	
16. Does the bank have procedures to establish a record for each new customer noting their respective identification documents and 'Know Your Customer' information?	YES	
17. Does the bank complete a risk-based assessment to understand the normal and expected transactions of its customers?	YES	
IV. Reportable Transactions and Prevention and Detection of Transactions with Illegally Obtained Funds		<u>Yes</u> <u>No</u>
18. Does the bank have policies or practices for the identification and reporting of transactions that are required to be reported to the authorities?	YES	
19. Where cash transaction reporting is mandatory, does the bank have procedures to identify transactions structured to avoid such obligations?	YES	
20. Does the bank screen customers and transactions against lists of persons, entities or countries issued by government/competent authorities?	YES	
21. Does the bank have policies to reasonably ensure that it only operates with correspondent banks that possess licenses to operate in their countries of origin?	YES	
V. Transaction Monitoring		<u>Yes</u> <u>No</u>
22. Does the bank have a monitoring program for unusual and potentially suspicious activity that covers funds transfers and monetary instruments such as traveler's checks, money orders, etc?	YES	
VI. AML Training		<u>Yes</u> <u>No</u>
23. 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 bank's products and services. ▪ Internal policies to prevent money laundering. 	YES	
24. Does the bank retain records of its training sessions including attendance records and relevant training materials used?	YES	
25. Does the bank communicate new AML related laws or changes to existing AML related policies or practices to relevant employees?	YES	
26. Does the bank employ third parties to carry out some of the functions of the bank?		NO
27. If the answer to question 26 is yes, does the bank provide AML training to relevant third parties 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 		

FI's products and services. ▪ Internal policies to prevent money laundering.		
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FATCA STATUS

Compliance	YES
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AML officer in charge

Name:	Yaqoub H. Al-Ebrahim
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Signature	