the Wolfsberg Group

البنك العربي ARAB BANK

Financial Institution Name:	Arab Bank plc
Location (Country) :	Please refer to Addendum "A"

No #	Question	Answer
1. ENTITY & OWNERSHIP		
1	Full Legal name	Arab Bank plc
2	Append a list of foreign branches which are covered by this questionnaire (if applicable)	Please refer to Addendum "A"
3	Full Legal (Registered) Address	Please refer to Addendum "A"
4	Full Primary Business Address (if different from above)	Not applicable
5	Date of Entity incorporation/establishment	Arab Bank plc was incorporated in 1930
6	Select type of ownership and append an ownership chart if available	
6 a	Publicly Traded (25% of shares publicly traded)	Yes
6 a1	If Y, indicate the exchange traded on and ticker symbol	Arab Bank plc shares are traded on Amman Stock Exchange, Amman, Jordan. Ticker symbol is (ARBK)
6 b	Member Owned/Mutual	No
6 c	Government or State Owned by 25% or more	No
6 d	Privately Owned	No
6 d1	If Y, provide details of shareholders or ultimate beneficial owners with a holding of 10% or more	Not applicable
7	% of the Entity's total shares composed of bearer shares	Not applicable
8	Does the Entity, or any of its branches, operate under an Offshore Banking License (OBL) ?	Yes
8 a	If Y, provide the name of the relevant branch/es which operate under an OBL	Arab Bank plc Singapore Branch - Singapore Arab Bank plc Bahrain Wholesale Branch - Bahrain
9	Does the Bank have a Virtual Bank License or provide services only through online channels?	No
10	Provide Legal Entity Identifier (LEI) if available	5493001JH4LYPQTBQP79
2. AML, CTF & SANCTIONS PROGRAMME		
11	Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:	
11 a	Appointed Officer with sufficient experience/expertise	Yes
11 b	Adverse Information Screening	Yes
11 c	Beneficial Ownership	Yes
11 d	Cash Reporting	Yes
11 e	CDD	Yes
11 f	EDD	Yes
11 g	Independent Testing	Yes
11 h	Periodic Review	Yes
11 i	Policies and Procedures	Yes
11 j	PEP Screening	Yes
11 k	Risk Assessment	Yes
11 l	Sanctions	Yes
11 m	Suspicious Activity Reporting	Yes
11 n	Training and Education	Yes
11 o	Transaction Monitoring	Yes
12	Is the Entity's AML, CTF & Sanctions policy approved at least annually by the Board or equivalent Senior Management Committee?	Yes
13	Does the Entity use third parties to carry out any components of its AML, CTF & Sanctions programme?	No
13 a	If Y, provide further details	

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14	Does the entity have a whistleblower policy?	Yes
3. ANTI BRIBERY & CORRUPTION		
15	Has the Entity documented policies and procedures consistent with applicable ABC regulations and requirements to reasonably prevent, detect and report bribery and corruption?	Yes
16	Does the Entity's internal audit function or other independent third party cover ABC Policies and Procedures?	Yes
17	Does the Entity provide mandatory ABC training to:	
17 a	Board and Senior Committee Management	Yes
17 b	1st Line of Defence	Yes
17 c	2nd Line of Defence	Yes
17 d	3rd Line of Defence	Yes
17 e	Third parties to which specific compliance activities subject to ABC risk have been outsourced	Not Applicable
17 f	Non-employed workers as appropriate (contractors/consultants)	Yes
4. AML, CTF & SANCTIONS POLICIES & PROCEDURES		
18	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report:	
18 a	Money laundering	Yes
18 b	Terrorist financing	Yes
18 c	Sanctions violations	Yes
19	Does the Entity have policies and procedures that:	
19 a	Prohibit the opening and keeping of anonymous and fictitious named accounts	Yes
19 b	Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs	Yes
19 c	Prohibit dealing with other entities that provide banking services to unlicensed banks	Yes
19 d	Prohibit accounts/relationships with shell banks	Yes
19 e	Prohibit dealing with another Entity that provides services to shell banks	Yes
19 f	Prohibit opening and keeping of accounts for Section 311 designated entities	Yes
19 g	Prohibit opening and keeping of accounts for any of unlicensed/unregulated remittance agents, exchanges houses, casa de cambio, bureaux de change or money transfer agents	Yes
19 h	Assess the risks of relationships with domestic and foreign PEPs, including their family and close associates	Yes
19 i	Define the process for escalating financial crime risk issues/potentially suspicious activity identified by employees	Yes
19 j	Outline the processes regarding screening for sanctions, PEPs and Adverse Media/Negative News	Yes
20	Has the Entity defined a risk tolerance statement or similar document which defines a risk boundary around their business?	Yes
21	Does the Entity have record retention procedures that comply with applicable laws?	Yes
21 a	If Y, what is the retention period?	5 years or more
5. KYC, CDD and EDD		
22	Does the Entity verify the identity of the customer?	Yes
23	Do the Entity's policies and procedures set out when CDD must be completed, e.g. at the time of onboarding or within 30 days?	Yes
24	Which of the following does the Entity gather and retain when conducting CDD? Select all that apply:	
24 a	Customer identification	Yes
24 b	Expected activity	Yes
24 c	Nature of business/employment	Yes
24 d	Ownership structure	Yes
24 e	Product usage	Yes

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24 f	Purpose and nature of relationship	**Yes**
24 g	Source of funds	**Yes**
24 h	Source of wealth	**Yes**
25	Are each of the following identified:	
25 a	Ultimate beneficial ownership	**Yes**
25 a1	Are ultimate beneficial owners verified?	**Yes**
25 b	Authorised signatories (where applicable)	**Yes**
25 c	Key controllers	**Yes**
25 d	Other relevant parties	**Yes, e.g. CEO, Board of Directors, etc.**
26	Does the due diligence process result in customers receiving a risk classification?	**Yes**
27	Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?	**Yes**
28	Does the Entity have policies, procedures and processes to review and escalate potential matches from screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?	**Yes**
29	Is KYC renewed at defined frequencies based on risk rating (Periodic Reviews)?	**Yes**
29 a	If yes, select all that apply:	
29 a1	Less than one year	**No**
29 a2	1 – 2 years	**Yes**
29 a3	3 – 4 years	**Yes**
29 a4	5 years or more	**No**
29 a5	Trigger-based or perpetual monitoring reviews	**Yes**
29 a6	Other (please specify)	**Arab Bank plc updates its customers information on an ongoing basis (e.g. every "2" years for High ML/TF Risk customers and yearly for certain categories of High ML/TF Risk customers, every "3" years for Moderate ML/TF Risk customers and every "4" years for Low ML/TF Risk customers), or when there are other reasons that require more frequency for due diligence reviews**
30	From the list below, which categories of customers or industries are subject to EDD and/or are restricted, or prohibited by the Entity's FCC programme?	
30 a	Arms, Defence, Military	**Always subject to EDD**
30 b	Correspondent Banks	**EDD on risk-based approach**
30 b1	If EDD or EDD & restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022?	**Yes**
30 c	Embassies/Consulates	**EDD on risk-based approach**
30 d	Extractive industries	**EDD on risk-based approach**
30 e	Gambling customers	**Prohibited**
30 f	General Trading Companies	**EDD on risk-based approach**
30 g	Marijuana-related Entities	**Prohibited**
30 h	MSB/MVTS customers	**Prohibited**
30 i	Non-account customers	**Prohibited**
30 j	Non-Government Organisations	**EDD on risk-based approach**
30 k	Non-resident customers	**EDD on risk-based approach**
30 l	Nuclear power	**Prohibited**
30 m	Payment Service Provider	**EDD on risk-based approach**
30 n	PEPs	**EDD on risk-based approach**
30 o	PEP Close Associates	**EDD on risk-based approach**
30 p	PEP Related	**EDD on risk-based approach**
30 q	Precious metals and stones	**EDD on risk-based approach**
30 r	Red light businesses/Adult entertainment	**Prohibited**
30 s	Regulated charities	**EDD on risk-based approach**
30 t	Shell banks	**Prohibited**

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30 u	Travel and Tour Companies	**EDD on risk-based approach**
30 v	Unregulated charities	**Prohibited**
30 w	Used Car Dealers	**Always subject to EDD**
30 x	Virtual Asset Service Providers	**Prohibited**
30 y	Other (specify)	**Yes - Entities or individuals that pose significant reputational risk to Arab Bank plc.**
31	If restricted, provide details of the restriction	**Restrictions include capping the value and volume, type of accounts, products and services provided, etc.**
6. MONITORING & REPORTING		
32	Does the Entity have risk based policies, procedures and monitoring processes for the identification and reporting of suspicious activity?	**Yes**
33	What is the method used by the Entity to monitor transactions for suspicious activities?	**Automated**
33 a	If manual or combination selected, specify what type of transactions are monitored manually	**Not applicable**
34	Does the Entity have regulatory requirements to report suspicious transactions?	**Yes**
34 a	If Y, does the Entity have policies, procedures and processes to comply with suspicious transactions reporting requirements?	**Yes**
35	Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity?	**Yes**
7. PAYMENT TRANSPARENCY		
36	Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards?	**Yes**
37	Does the Entity have policies, procedures and processes to reasonably comply with and have controls in place to ensure compliance with:	
37 a	FATF Recommendation 16	**Yes**
37 b	Local Regulations	**Yes**
37 b1	If Y, Specify the regulation	**AML/CTF Laws and Regulations issued by the Home and Host Competent Authorities (e.g. Central Banks), where Arab Bank plc operates.**
37 c	If N, explain	**Not applicable**

8. SANCTIONS		
38	Does the Entity have a Sanctions Policy approved by management regarding compliance with sanctions law applicable to the Entity, including with respect to its business conducted with, or through accounts held at foreign financial institutions?	**Yes**
39	Does the Entity have policies, procedures or other controls reasonably designed to prohibit and/or detect actions taken to evade applicable sanctions prohibitions, such as stripping, or the resubmission and/or masking, of sanctions relevant information in cross border transactions?	**Yes**
40	Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists?	**Yes**
41	Select the Sanctions Lists used by the Entity in its sanctions screening processes:	
41 a	Consolidated United Nations Security Council Sanctions List (UN)	**Used for screening customers and beneficial owners and for filtering transactional data**
41 b	United States Department of the Treasury's Office of Foreign Assets Control (OFAC)	**Used for screening customers and beneficial owners and for filtering transactional data**
41 c	Office of Financial Sanctions Implementation HMT (OFSI)	**Used for screening customers and beneficial owners and for filtering transactional data**
41 d	European Union Consolidated List (EU)	**Used for screening customers and beneficial owners and for filtering transactional data**
41 e	Lists maintained by other G7 member countries	**Used for screening customers and beneficial owners and for filtering transactional data**
41 f	Other (specify)	**Arab Bank plc, also uses other sanctions and watch-lists (e.g. DFAT, country specific local lists, Arab Bank plc Internal lists, etc.) for screening customers and beneficial owners and for filtering transactional data, and World Check lists for screening customers and beneficial owners.**
42	Does the Entity have a physical presence, e.g. branches, subsidiaries, or representative offices located in countries/regions against which UN, OFAC, OFSI, EU or G7 member countries have enacted comprehensive jurisdiction-based Sanctions?	**Yes**
9. TRAINING & EDUCATION		
43	Does the Entity provide mandatory training, which includes:	
43 a	Identification and reporting of transactions to government authorities	**Yes**
43 b	Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered	**Yes**
43 c	Internal policies for controlling money laundering, terrorist financing and sanctions violations	**Yes**
43 d	New issues that occur in the market, e.g. significant regulatory actions or new regulations	**Yes**
44	Is the above mandatory training provided to :	
44 a	Board and Senior Committee Management	**Yes**
44 b	1st Line of Defence	**Yes**
44 c	2nd Line of Defence	**Yes**
44 d	3rd Line of Defence	**Yes**
44 e	Third parties to which specific FCC activities have been outsourced	**Not Applicable**
44 f	Non-employed workers (contractors/consultants)	**Yes**
10. AUDIT		
45	In addition to inspections by the government supervisors/regulators, does the Entity have an internal audit function, a testing function or other independent third party, or both, that assesses FCC AML, CTF, ABC, Fraud and Sanctions policies and practices on a regular basis?	**Yes**

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Signature Page

Wolfsberg Group Financial Crime Compliance Questionnaire 2023 (FCCQ V1.2)

I, **Maram Al-Jazireh (SVP & Head of Financial Institutions),** certify that I have read and understood this declaration, that the answers provided in this Wolfsberg FCCQ are complete and correct to my honest belief.

I, **Mohammed Dabbour (SVP & Director of Group Regulatory Compliance/Group MLRO),** certify that I have read and understood this declaration, that the answers provided in this Wolfsberg FCCQ are complete and correct to my honest belief.

August, 2025

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Certification Applicable to the Following Arab Bank Plc Branches

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. Shmeisani, Amman - Jordan	Central Bank of Jordan	http://www.cbj.gov.jo/
Arab Bank	Branch	Algeria	N°12 Val d'Hydra (Residence Chabani) Hydra – Alger, Algeria	Bank of Algeria	http://www.bank-of-algeria.dz/
Arab Bank	Branch (Retail and Wholesale)	Bahrain	Building No. 540 Road 1706 - Block 317 Diplomatic Area, Manama – Bahrain	Central Bank of Bahrain	http://www.cbb.gov.bh/home.php
Arab Bank	Branch	Egypt	Plot 43 North 90 St., 5th Settlement - New Cairo, Cairo, Egypt	Central Bank of Egypt	http://www.cbe.org.eg/
Arab Bank	Branch	Lebanon	Riad El Solh Sq. Banks Street, Commercial Buildings Co. Bldg. Beirut – Lebanon	Banque du Liban (Central Bank of Lebanon)	http://www.bdl.gov.lb/
Arab Bank	Branch	Morocco	174 Mohamed V Street, Casablanca – Morocco	Bank Al-Maghrib (Central Bank of Morocco)	http://www.bkam.ma/
Arab Bank	Branch	Palestine	Rafat Street Opposite to Ocean Grand Hotel Masyoon – Ramallah – Palestine	Palestine Monetary Authority	http://www.pma.ps/
Arab Bank	Branch	Qatar	Grand Hammed St.119 Area No.6 – Building No.67 Doha – Qatar	Qatar Central Bank	http://www.qcb.gov.qa/English/Pages/default.aspx
Arab Bank	Branch	Singapore	3 Fraser Street, Duo Tower #10-21, Singapore 189352	Monetary Authority of Singapore	http://www.mas.gov.sg/
Arab Bank	Branch	UAE	Emaar Square, Building # 2, Dubai – UAE	Central Bank of UAE	http://www.centralbank.ae/index.php

Entity Name	Type	Country	Main Address	Key Local Regulator(s)	Key Local Regulator(s) Website(s)
Arab Bank	Branch	Yemen	Zubairi Str., Sana'a - Yemen	Central Bank of Yemen	http://www.centralbank.gov.ye/
Arab Bank	Branch	China	Unit 4505-07, Two IFC ،No. 8 Century Avenue, Pudong New District, Shanghai PRC - China	People's Bank of China	http://www.pbc.gov.cn