



**Know Your Customer (KYC)  
Anti-Money Laundering (AML)  
Combating the Financing of Terrorism (CFT)**

**DUE DILIGENCE QUESTIONNAIRE**

Section 1: Corporate Information									
1	Name of Institution	Ahli Capital Investment Company ( K.S.C.C )							
2	Financial Institution Name & Location	Ahli Capital Investment Company ( K.S.C.C ) Kuwait							
3	Mailing Address Phone # Fax # Website  Swift code :	#00965-1832832  #00965-22466187  <a href="https://www.ahli-capital.com">https://www.ahli-capital.com</a>  <u>ABKKKWKW</u>							
4	Are you/your holding company a publicly traded company? If so, which stock exchange(s) does your institution/your holding company trade on? Please include the trading name and stock code.	N/A							
5	Please provide a list of your institution's directors, as well as senior management.	<b>Board of Directors:</b> 1- Sahar Abdulaziz Al-Rumaih 2- Yasmine Marwan Salamah 3- Georges Richani 4- Naser Adel Behbehabi 5- Khaled Hussain Alshatti <b>Senior Management:</b> 1- Husayn Shahrur - CEO 2- Rajesh George - Head Of Asset Management 3- Masoumah A Ibraheem - Head Of Investment Advisory							
6	Please provide a list of the major shareholders holding equal to or more than 5% shares in your institution	<table border="1"> <thead> <tr> <th>Name</th> <th>Share Holding</th> <th>Place of Incorporation</th> </tr> </thead> <tbody> <tr> <td>Ahli Bank Of Kuwait</td> <td>99.778 %</td> <td>Kuwait</td> </tr> </tbody> </table>	Name	Share Holding	Place of Incorporation	Ahli Bank Of Kuwait	99.778 %	Kuwait	
Name	Share Holding	Place of Incorporation							
Ahli Bank Of Kuwait	99.778 %	Kuwait							
7	Does your institution have branches and/or subsidiaries? <b>No</b>								
8	Does this questionnaire apply to your head office as well as: a) Branches? b) Subsidiaries? <b>N/A</b>								
9	If you answered no to question 7, please provide the name, location and contact details for the branches and/or subsidiaries that are not represented by this questionnaire.	<table border="1"> <thead> <tr> <th>Name</th> <th>Location</th> <th>Contact Details</th> </tr> </thead> <tbody> <tr> <td>N/A</td> <td></td> <td></td> </tr> </tbody> </table>	Name	Location	Contact Details	N/A			
Name	Location	Contact Details							
N/A									

10	Name the regulating body that oversees your institution. Please provide a copy of your institution's license and registration number.	Capital Market Authority
11	Name of Agency issuing license	Capital Market Authority Ministry Of Commerce and Industry Kuwait
12	Year of establishment	2006
13	Is your institution rated? Who has providing the rating?	N/A
14	Please provide contact information on the individual completing this form.	Name: Ahmad Ashour Title: Head Of Compliance  Address: Kuwait  Tel No: 00965 - 66232341 E-mail Address: <a href="mailto:aashour@abkuwait.com">aashour@abkuwait.com</a>
15	Do you have a primary compliance officer who is responsible for Anti-Money Laundering (AML) and "Know Your Customer" (KYC) compliance? If so, Please provide contact information.	Name: Ahmad Ashour Title: Head Of Compliance  Address: Kuwait  Tel No: 00965 - 66232341 E-mail Address: <a href="mailto:aashour@abkuwait.com">aashour@abkuwait.com</a>
16	Your institution's major business activities	Investment
17	Who are the external auditors of your institution	Ernest and Young
18	Does your Primary Regulator audit your AML and KYC procedures? If yes, how frequently and when was it last carried out?	Audited By Capital Market Authority In 2020

**Section 2**  
**Anti-Money Laundering Questionnaire**

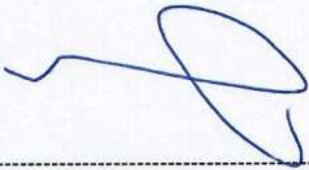
Financial Institution Name:		Ahli Capital Investment Company ( K.S.C.C )	
Location:		Kuwait	
<b>I</b>	<b>General AML Policies, Practices and Procedures:</b>	<b>Yes</b>	<b>No</b>
1.	Is the AML compliance program approved by the FI's Board or a senior committee? <b>FI's Board</b>	<input checked="" type="checkbox"/>	N <input type="checkbox"/>
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?	<input checked="" type="checkbox"/>	N <input type="checkbox"/>
3.	Has the FI developed written policies documenting the processes that they have in place to prevent, detect and report suspicious transactions?	<input checked="" type="checkbox"/>	N <input type="checkbox"/>
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?	<input checked="" type="checkbox"/>	N <input type="checkbox"/>
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.)	<input checked="" type="checkbox"/>	N <input type="checkbox"/>

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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
7.	Does the FI have policies covering relationships with Politically Exposed Persons (PEP's), their family and close associates?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
8.	Does the FI have record retention procedures that comply with applicable law?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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? <b>N/A</b>	<input type="checkbox"/>	<input type="checkbox"/>
<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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
13.	Does the FI have a requirement to collect information regarding its customers' business activities?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
14.	Does the FI assess its FI customers' AML policies or practices?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
15.	Does the FI have a process to review and, where appropriate, update customer information relating to high risk client information?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
16.	Does the FI have procedures to establish a record for each new customer noting their respective identification documents and 'Know Your Customer' information?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
17.	Does the FI complete a risk-based assessment to understand the normal and expected transactions of its customers?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
19.	Where cash transaction reporting is mandatory, does the FI have procedures to identify transactions structured to avoid such obligations? <b>Cash Deposited is not allowed</b>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
20.	Does the FI screen customers and transactions against lists of persons, entities or countries issued by government/competent authorities? (Similar lists designated under the United Nations Security Council Sanctions Committees, USA OFAC, and EU Sanctions etc.)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<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 cheques, money orders, etc?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>VI AML Training:</b>		<b>Yes</b>	<b>No</b>

24. Does the FI provide AML training to relevant employees that includes: a. Identification and reporting of transactions that must be reported to government authorities. b. Examples of different forms of money laundering involving the FI's products and services. c. Internal policies to prevent money laundering.	<input checked="" type="checkbox"/>	N <input type="checkbox"/>
25. Does the FI retain records of its training sessions including attendance records and relevant training materials used?	<input checked="" type="checkbox"/>	N <input type="checkbox"/>
26. Does the FI communicate new AML related laws or changes to existing AML related policies or practices to relevant employees?	<input checked="" type="checkbox"/>	N <input type="checkbox"/>
27. Does the FI employ third parties to carry out some of the functions of the FI?	<input checked="" type="checkbox"/>	N <input type="checkbox"/>
28. If the answer to question 27 is yes, does the FI provide AML training to relevant third parties that includes: a. Identification and reporting of transactions that must be reported to government authorities. b. Examples of different forms of money laundering involving the FI's products and services. c. Internal policies to prevent money laundering.	<input checked="" type="checkbox"/>	N <input type="checkbox"/>
<b>VII Supplemental Questions:</b>	<b>Yes</b>	<b>No</b>
29. Does the FI institution permit opening of anonymous or numbered accounts or accounts in fictitious names (i.e. accounts for which customer identification and verification is not performed) by customers?	Y <input type="checkbox"/>	<input checked="" type="checkbox"/>
30. Does the FI maintain Nested Accounts (i.e. Do you allow your customers/other financial institutions direct access to your accounts held with us)?	Y <input type="checkbox"/>	<input checked="" type="checkbox"/>
31. Will this account be used for extending sub-correspondent banking activities to other banks by you directly (nested accounts)? If so, please advise the policies for AML control for enrolling such banks by you.	Y <input type="checkbox"/>	<input checked="" type="checkbox"/>
32. Does the FI maintain correspondent banking relationships with another FI who allows direct use of their correspondent account by third parties to transact business on their behalf (i.e. payable-through account or nested account)?	Y <input type="checkbox"/>	<input checked="" type="checkbox"/>
33. Does the FI by the following definition hold an Offshore Banking License? 'License to conduct banking activities which, as a condition of the license, prohibits the licensed entity from conducting banking activities with the citizens of, or in the local currency of, the country which issued the license'.	Y <input type="checkbox"/>	<input checked="" type="checkbox"/>
34. Does the FI establish effective controls to detect money laundering activities to identify and prevent proceeds of crime laundered through system?	<input checked="" type="checkbox"/>	N <input type="checkbox"/>
35. Provide names and versions of the filtering systems that FI has in place to screen clients and transactions.	<input checked="" type="checkbox"/>	N <input type="checkbox"/>
36. What is the name of the provider of the Sanctions Screening system for Trade Transactions? And do you currently use to screen Trade transactions and related documents? Is this system manual or automated?	<input checked="" type="checkbox"/>	N <input type="checkbox"/>
37. Does the local and international Sanctions Screening Lists are checked by the system or manually?	<input checked="" type="checkbox"/>	N <input type="checkbox"/>
38. Is the Sanctions Screening system audited?, If so, when was it last audited? Which Company undertook this process? Were any issues identified as part of this audit process?	<input checked="" type="checkbox"/>	N <input type="checkbox"/>
39. Is money laundering a criminal offence in your country?	<input checked="" type="checkbox"/>	N <input type="checkbox"/>

40. Does FI ensure that effective controls for AML and counter terrorism are in place on new products and when dealing with non-face to face customers or through intermediaries?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
41. Does FI verify identity of such foreign bank customers and conduct additional due diligence on them?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
42. Does FI identify the owners of the foreign banks that maintain nested accounts, if its shares are not publically traded? <b>N/A</b>	<input type="checkbox"/>	<input type="checkbox"/>
43. Does FI require complete information for outgoing wire transfer instructions, including sender and beneficiary names, addresses, account number and purpose?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
44. Does the FI's KYC policy require true identification of the customer, full address, and profession, source of funds, economic activities and nature of anticipated transaction activities as per FATF recommendations?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
45. Do you undertake regular reviews of your relationship KYC and AML perspective? If yes, at what frequency? <b>Annually For High Risk Clients, Every 2 Year For Medium Risk Clients and 3 Year for the Low risk Clients</b>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
46. Does FI have policy to deal with non-customers who may send trade documents, e.g. export LC, and Import collections, directly to FI and where an account relationship may not exist? <b>N/A</b>	<input type="checkbox"/>	<input type="checkbox"/>
47. Do the regulations require FI to report any suspicious transaction to Law enforcement or other agency designed for this purpose?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
48. Does the FI have policy to protect employees, if they report, in good faith, any suspicious activities/transactions?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
49. Does FI monitor implementation of AML/CFT policies and procedures on permanent basis?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
50. Is your organization subject to laws designed to combat money laundering & terrorist financing in your home country? (If yes, state the reference no. of the relevant law/ regulation of the country/ regulator.) <b>AML/CFT Law 106 / 2013 Kuwait Law</b>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
51. Does your bank hold a current and valid banking license?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
52. Are the shares of your bank issued as bearer shares? (Bearer shares refers to shares owned by the person who holds the physical share certificate, and is transferable by delivery).	<input type="checkbox"/>	<input checked="" type="checkbox"/>
53. Does your regulator/s require reporting of cross border transactions? If Yes, provide threshold.	<input type="checkbox"/>	<input checked="" type="checkbox"/>
54. Is your bank a shell bank? <b>N/A</b>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
55. Does your bank have any branches or subsidiaries operating as an OBU (Offshore Banking Unit)? <b>N/A</b>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
56. Has your bank / parent organization / holding company been prosecuted or fined by your regulators for failure to comply with stipulated AML/CFT laws and regulations in last five years? If yes, please provide details in brief.	<input type="checkbox"/>	<input checked="" type="checkbox"/>
57. Is any of your bank's owner or senior management a politically exposed person (PEP) as defined by FATF? If yes, please provide following additional information for each PEP : Full Name :- Address :- Date and place of birth :- Designation in the bank (Executive/ Non-executive) :- Percentage shareholding in the bank :- PEP Information as defined by FATF :-	<input type="checkbox"/>	<input checked="" type="checkbox"/>

58. Please advise if any of your owners or members of senior management have adverse criminal/ regulatory history against them? If so, please advise details.	Y <input type="checkbox"/>	<input checked="" type="checkbox"/>
59. Does your AML/CFT policy is periodically reviewed, updated and approved by your bank's board of directors or other senior committee? <b>By Board Of Directors</b>	<input checked="" type="checkbox"/>	N <input type="checkbox"/>
60. Does your organization maintain all relevant document and information in respect of customer identity and transaction records? If Yes, please state the record retention period.	<input checked="" type="checkbox"/>	N <input type="checkbox"/>
61. Does the policy clearly define roles, responsibilities and accountability of each staff in relation to anti-money laundering compliance?	<input checked="" type="checkbox"/>	N <input type="checkbox"/>
62. Do AML/CFT procedures of your bank require the verification of identification data for all customers?	<input checked="" type="checkbox"/>	N <input type="checkbox"/>
63. Does your bank conduct transactions for non-established customers (such as walk in customers – for example sale of monetary instruments (payorder/demand draft) or wire transfers etc.)? If yes, a) please advise the monetary limits observed, if any and ; b) Whether customers are identified and verified for each such transaction.	Y <input type="checkbox"/>	<input checked="" type="checkbox"/>
64. Has your Bank put in place procedures to verify originator identity information (account/identification number, name & address) and capture the same in wire transfer advice while originating the same?	<input checked="" type="checkbox"/>	N <input type="checkbox"/>
65. Does your bank provide services to companies whose ownership is evidenced by bearer shares?	Y <input type="checkbox"/>	<input checked="" type="checkbox"/>
66. Do you maintain correspondent relationship with any banks/FIs incorporated/located in Myanmar, Iran, North Korea, Cuba, Syria & Sudan (irrespective of their location)? If so, please provide names of such Banks/ FIs.	Y <input type="checkbox"/>	<input checked="" type="checkbox"/>
67. Do you (including your beneficial owners) have affiliations, including business activities and joint venture partnerships, or involvement with an individual or entity that is (a) located in these countries, or (b) connected or associated with the government of these countries	Y <input type="checkbox"/>	<input checked="" type="checkbox"/>



Name: **Ahmad Ashour**  
Title: Head of Compliance

Date: 02/06/2022