Due Diligence Report & Anti-Money Laundering Questionnaire

Part I

General Information

1. Institution Name	Bank of Jordan Company
2. Institution Type / Legal Form	Public Shareholding Company - Branch of a foreign company
3. Location	Kingdom of Bahrain
4. Date and Country of Incorporation	14th January 2018 Kingdom of Bahrain
5. Commercial Registration No. & Banking License Type and No.	Commercial Registration No. 118835-1 Banking License Type: Conventional Wholesale Bank (Branch) - No. WB/087
6. Name & Website of the Regulator	Central Bank of Bahrain www.cbb.gov.bh
7. Name of the Major Shareholders	Bank of Jordan Company - Jordan – 100%
8. Name of the stock exchange	Amman Stock Exchange (ASE) - BOJX
9. FATCA Status and GIIN No.	Participating in Module 1 FFI VTB927.00000.BR.048
10. Value Added Tax (VAT) Number	220000787000002
11. Registered Address	Flat 4201, Building 1459, Road 4626, Block 346, Bahrain Financial Harbour, West Tower, Level 42, Manama – Sea Front, Kingdom of Bahrain
12. Contact Details	Phone No. +973 16 67 67 67 Fax No. +973 16 67 67 68 Swift Code BJORBHBM
13. Website	http://www.bankofjordan.com/
14. Name & Address of the External Auditor	Deloitte & Touche – Middle East Flat 3405, Building 316, Road 4609, Block 346 Manama – Sea Front, Kingdom of Bahrain

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Part II

AML Questionnaire (Based on the Wolfsberg Group AML Questionnaire)

1. General AML Policies, Practices and Procedures		
1.1	Is the AML/CFT compliance program approved by the FI's board or a senior committee?	Yes
1.2	Does the FI have a legal and regulatory compliance program that includes a designated officer that is responsible for coordinating and overseeing the AML/CFT framework?	Yes
1.3	Has the FI developed written policies documenting the processes that they have in place to prevent, detect and report suspicious transactions?	Yes
1.4	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/CFT policies and practices on a regular basis?	Yes
1.5	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).*	Yes
1.6	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?	Yes
1.7	Does the FI have policies covering relationships with Politically Exposed Persons (PEP's), their family and close associates?	Yes
1.8	Does the FI have record retention procedures that comply with applicable law?	Yes
1.9	Are the FI's AML/CFT 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?	Yes

2. Risk Assessment		
2.1	Does the FI have a risk-based assessment of its customer base and their transactions?	Yes
2.2	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?	Yes

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3. Know Your Customer, Due Diligence and Enhanced Due Diligence		
3.1	Has the FI implemented processes for the identification of those customers on whose behalf it maintains or operates accounts or conducts transactions?	Yes
3.2	Does the FI have a requirement to collect information regarding its customers' business activities?	Yes
3.3	Does the FI assess its FI customers' AML/CFT policies or practices?	Yes
3.4	Does the FI have a process to review and, where appropriate, update customer information relating to high risk client information?	Yes
3.5	Does the FI have procedures to establish a record for each new customer noting their respective identification documents and 'Know Your Customer' information?	Yes
3.6	Does the FI complete a risk-based assessment to understand the normal and expected transactions of its customers?	Yes

4. Reportable Transactions and Prevention and Detection of Transactions with Illegally Obtained Funds		
4.1	Does the FI have policies or practices for the identification and reporting of transactions that are required to be reported to the authorities?	Yes
4.2	Where cash transaction reporting is mandatory, does the FI have procedures to identify transactions structured to avoid such obligations?	N/A
4.3	Does the FI screen customers and transactions against lists of persons, entities or countries issued by government/competent authorities?	Yes
4.4	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?	Yes
4.5	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? 1	Yes*

*MT 205/205COV – not used

5. Transaction Monitoring		
5.1	Does the FI have a monitoring program for unusual and potentially suspicious activity that covers funds transfers and monetary instruments such as travelers checks, money orders, etc?	Yes

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6. AML/CFT Training		
6.1	Does the FI provide AML/CFT training to relevant employees that includes: ▪ 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.	Yes
6.2	Does the FI retain records of its training sessions including attendance records and relevant training materials used?	Yes
6.3	Does the FI communicate new AML/CFT related laws or changes to existing AML/CFT related policies or practices to relevant employees?	Yes
6.4	Does the FI employ third parties to carry out some of the functions of the FI?	No
6.5	If the answer to question 6.4 is yes, does the FI provide AML/CFT training to relevant third parties that includes: ▪ 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.	N/A

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1 The four payment message standards to be observed are: i) FIs should not omit, delete, or alter information in payment messages or orders for the purpose of avoiding detection of that information by any other FI in the payment process; ii) FIs should not use any particular payment message for the purpose of avoiding detection of information by any other FI in the payment process; iii) Subject to applicable laws, FIs should cooperate as fully as practicable with other FIs in the payment process when requesting to provide information about the parties involved; and (iv) FIs should strongly encourage their correspondent banks to observe these principles.

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