

Anti-Money Laundering & Counter Terrorist Financing Questionnaire

Part 1. General Information.		
1.	Registered Name of the Institution:	Arabia Islamic Bank P.S.C
2.	Trading Name (if different):	Arabia Islamic Bank
3.	Registered at:	Iraqi Ministry of Trade, Registration of Companies
4.	Registered Address:	Bldg. No.1-14th Ramadan St-Al Mansour-Baghdad-Iraq
5.	Head Office Address:	Bldg. No.1-14th Ramadan St-Al Mansour-Baghdad-Iraq
6.	Website	www.ab.iq
7.	List of exchanges:	Iraq Stock Exchange Symbol : BAAI
8.	Name and Website of regulatory bodies	Name : Central Bank of Iraq - Iraq
		Website: www.cbi.iq
9.	Banking License No. & Date & Place Issued:	9/3/9847 At: 20 June 2016 Iraq
10.	License Type:	Practice Islamic banking
11.	Registration number	No.SH/H2/23339 At: 7 Dec 2016
12.	FATCA GIIN	2IVT08.00000.LE.368
13.	Name & address of External Auditor:	Khalil Ibrahim Mohamed Al Abdullah Co. and his partners for Accounts monitoring and Auditing. Al Karada - Baghdad - Iraq
14.	SWIFT Address:	ARLMIQBA
15.	Name of Parent Company (if applicable):	N/A
16.	Country of Incorporation of Parent Company:	N/A
17.	Number of branches	5
18.	Are our shares publicly traded?	YES
19.	Do we publish our latest financial statements annual and quarterly	YES
20.	Does our institution have a Corporate Code of Ethics?	YES

Part 2. MANAGEMENT & COMPOSITION OF SHAREHOLDERS

A. OWNERSHIP INFORMATION - MAIN SHAREHOLDERS

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

Name	Ownership Interest (percentage)	Nature of ownership (direct / indirect)
Abdulmunem Mahdi Saleh Al Salawi	9.9%	Direct
Aws Abdulmunem Mahdi Al Salawi	9.9%	Direct
Mustafa Abdulmunem Mahdi Al Salawi	9.9%	Direct
Wasan Hasan Ali Al Kallab	9.9%	Direct
Mohammed Habeeb Hussein Al Mulla	9.9%	Direct
MARYAM Mohammed Habeeb Al Mulla	9.9%	Direct
Mohanad Habeeb Hussein Al Mulla	9.9%	Direct
Alaa Habeeb Hussein Al Mulla	5.2%	Direct
Samer Ahmed Mahdi AlAbbasi	5.1%	Direct
Mnares Ahmed Saleh Al Salawi	5.1%	Direct
Sajjad Mohanad Habeeb Al Mulla	5%	Direct
Hasanain Mohanad Habeeb Al Mulla	5%	Direct
Sarah Mohanad Habeeb Al Mulla	5%	Direct

B. Board of Directors

Name	Designation	Nationality
Ahmed Abdulmajeed Jumaa	Chairman	Iraqi
Azhar Muaed Ahmed	Vice Chairman	Iraqi
Duraïd Yaseen Hamdan	Board Member	Iraqi
Abdulmunem Mahdi Saleh Al Salawi	Board Member	Iraqi
Ban Darweesh Frari	Board Member	Iraqi
Jihad Mohammed Ali Khursheed	Board Member	Iraqi
Hayder Akram Mohammed Ali	Board Member	Iraqi
Huda Abdulwahab Hasan	Board Member	Iraqi

C. Management:

Name	Designation	Nationality	Email Address
Duraïd Yaseen Hamdan	Managing Director	Iraqi	Duraïd.hamdan@alarabiyabank.iq
Ali Hussein Jebur	Assistant Managing Director	Iraqi	Ali.jabr@alarabiyabank.iq
Hiba Redha Mahdi	Compliance Department Manager	Iraqi	compliance@alarabiyabank.iq
Fadiya Ghanim Khalil	Audit Manager	Iraqi	int_audit.dep@alarabiyabank.iq
Rana AbdulKareem Fajr	Assistant Manager Of Finance Dept.	Iraqi	finance.dep@alarabiyabank.iq
Hala Neama Abbas	Risk Management Director	Iraqi	risk.dep@alarabiyabank.iq
Shuhub Abdulkhaliq Ahmed	HR Manager	Iraqi	hr.dep@alarabiyabank.iq
Dashti Abdullah Mohammed	Manager Of Information Technology Dept.	Iraqi	Dashti.mohamed@alarabiyabank.iq
Maram Rafid Nayyef	Assistant Manager Of The International Dept	Iraqi	int.dept@alarabiyabank.iq
Zahraa Saeed Abbas	Manger of AML/CFT	Iraqi	aml.dep@alarabiyabank.iq
Hiba Salih Hamid	Manager Of Payments dept.	Iraqi	payments.dep@alarabiyabank.iq
Shahad Amer Abbas	Assistant Manager Of Credit Dept	Iraqi	credit.dep@alarabiyabank.iq

Part 3. GENERAL AML POLICIES, PRACTICES & PROCEDURES			
I	GENERAL ISSUES	YES	NO
1.a	Has our 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 our institution subject to such laws/regulations?	✓	
2. b	provide reference to AML/CFT laws:	AML / CFT Law No. 39 of 2015	
2. c	Does our supervisory authority carry out supervision with special regard to the prevention of AML & CFT?	✓	
2. d	Is our country a member of FATF?	✓	
2. e	Has our country been evaluated by FATF?	✓	
II	AML/CFT POLICIES & PROCEDURES	YES	NO
3. a	Does our AML compliance program require approval of our Board of Directors or a senior committee thereof?	✓	
3. b	Has our institution established and implemented an AML/CFT compliance program and related procedures?	✓	
4.	Are our policies / procedures compliant with local laws & regulations with regard to AML / CFT?	✓	
5.	Are our policies / procedures compliant with the Financial Action Task Force's (40+9) Recommendations?	✓	
6.	Does our 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 we provide with a copy of our policies if requested by others?	✓	
8.	Are the AML/CFT policies and procedures applicable to our head office also applied to our majority owned subsidiaries (both local and overseas)? If 'No' please give / attach details of any units that are excluded:	✓	
9.	Does our policy require us to? a) Verify the true identity of all customers prior to entering into a business relationship / undertaking any transactions? b) Verify the true identity of underlying beneficial owners, if any? c) Verify the source of wealth / funds and the level of economic activity of our customers? d) Apply enhanced customer due diligence on those customers identified as having a higher risk profile? e) Periodically update due diligence information obtained? f) Review the AML/CFT controls of respondent banks before opening an account for them?	✓ ✓ ✓ ✓ ✓ ✓	
10.	Do our policies and procedures permit us to open or maintain anonymous accounts?		✓
11.	Do our policies and procedures permit us 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 our institution have policies covering relationships with Politically Exposed Persons (PEP's), their families and close associates?	✓	
III	RISK ASSESSMENT	YES	NO
13.	Does our institution conduit risk-based assessment of our customers and their transactions?	✓	
14.	Does our 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.	Do we 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?		✓
17.	Does our institution deal with walk-in customers?	✓ Western Union customers	
18.	Has our institution implemented systems for the identification of customers, including customer information in the case of recorded transactions, account opening, etc.	✓	
19.	Has our institution implemented processes for the identification of those customers on whose behalf it maintains or operates accounts or conducts transactions?	✓	
20.	Does our institution have a process to review and, where appropriate, update customer information relating to high risk client information?	✓	
21.	Does our institution comply with FATF Special Recommendations VII and ensure that full originator information is included in all payments that it makes?	✓	
V	TRANSACTION MONITORING	YES	NO
22.	Does our institution have a monitoring program for suspicious or unusual activity? If yes, is the transaction system automated or manual?	✓ automated	
23.	Does our institution have a monitoring system to automatically detect sanctioned names? If "Yes", please describe name of system (software).	✓ Refinitiv world- check	
24.	Does our institution have an established audit and / or compliance review function to test the adequacy of compliance with our AML / CFT policies and procedures?	✓	
25.	Does the regulatory body / competent authority in our country conduct AML / CFT reviews of our institution.	✓	
26.	Are we in compliance in all material respects with all relevant AML / CFT laws and regulations?	✓	
27.	Has our 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	YES	NO
28.	Does our institution have a monitoring program for unusual and potentially suspicious activity that covers funds transfers and monetary instruments?	✓	
29.	Where cash transaction reporting is mandatory, does our institution have procedures to identify transactions structured to avoid such obligations?	✓	
30.	Does our institution screen customers and transactions against lists of persons, entities or countries issued by government/competent authorities?	✓	
VII	AML TRAINING	YES	NO
31.	Does our 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?	✓ At least once a year	
32.	Does our institution retain records of its training sessions including attendance records & AML undertaken?	✓	
33.	Does our institution offer AML e-learning courses?	✓	
34.	Does our institution offers face to face & class training?	✓	
35.	Does our institution employ third parties to carry out some of the functions of our institution?		✓
VIII	CORRESPONDENT BANKING RELATIONSHIP	YES	NO
36.	Have any of our correspondent banks originated from certain jurisdictions such as Non-Cooperative countries and territories and countries sanctioned by the United Nations.		✓
37.	Has our institution established any procedures regarding the ongoing monitoring of activities conducted through such correspondent accounts?	N/A	

Part 4. MLRO & Compliance Officer's Details

Our institution's Anti Money Laundering Reporting Officer (AMLRO)'s details:

Name:	Zahraa Saeed Abbas	Phone:	00964-7810144078
Title:	AML Department Manager	E-Mail:	aml.dep@alarabiyabank.iq
Address:	Al-Karada - Iraq - Baghdad -		

Our institution's Compliance Officer's details:

Name:	Hiba Redha Mahdi	Phone:	00964-7902775907
Title:	Compliance Department Manager	E-Mail:	compliance@alarabiyabank.iq
Address:	Al Mansour-Iraq - Baghdad		

Name:	Mustafa Abdul Kareem Oleiwi	Phone:	00964-7707846605
Title:	- Assistant Compliance Department Manager - External Relations Officer for Financial Institutions.	E-Mail:	mustafa.oleiwi@alarabiyabank.iq
Address:	Al Yarmouk-Iraq - Baghdad		