
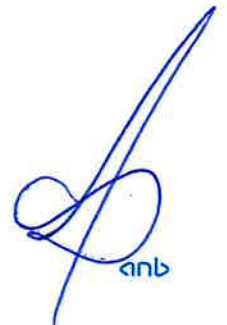


**the
Wolfsberg
Group**

Financial Institution Name:		Arab National Bank 
Location (Country) :		Kingdom of Saudi Arabia, Riyadh
No #	Question	Answer
1. ENTITY & OWNERSHIP		
1	Full Legal Name	Arab National Bank
2	Append a list of foreign branches / subsidiaries which are covered by this questionnaire	1- London Branch. 2- ANB Global Markets Limited, Grand Cayman, Cayman Island (subsidiary)
3	Full Legal (Registered) Address	National address 7317 King Faisal Rd. Al Murabba, Riyadh 12613-3536 P.O. Box 56921, Riyadh 11564, Kingdom of Saudi Arabia
4	Full Primary Business Address (if different from above)	
5	Date of Entity incorporation/establishment	June 13, 1979
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	Saudi Exchange, Ticker Symbol 1080
6 b	Member Owned/Mutual	No
6 c	Government or State Owned by 25% or more	No
6 d	Privately Owned	Yes
6 d1	If Y, provide details of shareholders or ultimate beneficial owners with a holding of 10% or more	Arab Bank PLC 40%
7	% of the Entity's total shares composed of bearer shares	N/A
8	Does the Entity, or any of its branches, operate under an Offshore Banking License (OBL)?	No
8 a	If Y, provide the name of the relevant branch/es which operate under an OBL	
9	Does the Bank have a Virtual Bank License or provide services only through online channels?	no
10	Name of primary financial regulator/supervisory authority	Saudi Central Bank (SAMA)
11	Provide Legal Entity Identifier (LEI) if available	213800CYWGYQVT1ZBQ57
12	Provide the full legal name of the ultimate parent (if different from the Entity completing the DDO)	N/A
13	Jurisdiction of licensing authority and regulator of ultimate parent	N/A
14	Select the business areas applicable to the Entity	
14 a	Retail Banking	Yes
14 b	Private Banking	Yes
14 c	Commercial Banking	Yes
14 d	Transactional Banking	Yes
14 e	Investment Banking	Yes
14 f	Financial Markets Trading	Yes
14 g	Securities Services/Custody	Yes
14 h	Broker/Dealer	Yes
14 i	Multilateral Development Bank	No
14 j	Wealth Management	Yes
14 k	Other (please explain)	Available at Bank's website: https://www.anb.com.sa/
15	Does the Entity have a significant (10% or more) portfolio of non-resident customers or does it derive more than 10% of its revenue from non-resident customers? (Non-resident means customers primarily resident in a different jurisdiction to the location where bank services are provided)	No
15 a	If Y, provide the top five countries where the non-resident customers are located.	
16	Select the closest value:	
16 a	Number of employees	1001-5000
16 b	Total Assets	Greater than \$500 million
17	Confirm that all responses provided in the above Section are representative of all the LE's branches.	All responses provided in the above section are representative of Arab National Bank branches and subsidiaries, except for the answers to Q10 and Q11.
17 a	If N, clarify which questions the difference/s relate to and the branches and subsidiaries that this applies	Q10&11 : Arab National Bank - London Branch also operates under U.K. rules & regulations Q11&11: ANB Global Markets Limited also operates under rules & regulations of Cayman Islands
18	If appropriate, provide any additional information/context to the answers in this section.	i) Arab National Bank - London Branch (LEI# 213800TXA268PS44MU66) ii) ANB Global Markets Limited, Cayman Islands (LEI # 213800ULJZJ62U8HD929)

2. PRODUCTS & SERVICES		
19	Does the Entity offer the following products and services:	
19 a	Correspondent Banking	Yes
19 a1	If Y	
19 a1a	Does the Entity offer Correspondent Banking services to domestic banks?	Yes
19 a1b	Does the Entity allow domestic bank clients to provide downstream relationships?	No
19 a1c	Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks?	Yes
19 a1d	Does the Entity offer Correspondent Banking services to foreign banks?	Yes
19 a1e	Does the Entity allow downstream relationships with foreign banks?	No
19 a1f	Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks?	Yes
19 a1g	Does the Entity offer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer	No
19 a1h	Does the Entity allow downstream relationships with MSBs, MVTs, or Payment Service Provider (PSPs)?	
19 a1h1	MSBs	No
19 a1h2	MVTs	No
19 a1h3	PSPs	No
19 a1i	Does the Entity have processes and procedures in place to identify downstream relationships with MSBs /MVTs/PSPs?	Yes
19 b	Cross-Border Bulk Cash Delivery	No
19 c	Cross-Border Remittances	Yes
19 d	Domestic Bulk Cash Delivery	No
19 e	Hold Mail	No
19 f	International Cash Letter	No
19 g	Low Price Securities	No
19 h	Payable Through Accounts	No. (Prohibited)
19 i	Payment services to non-bank entities who may then offer third party payment services to their customers?	No
19 i1	If Y, please select all that apply below?	
19 i2	Third Party Payment Service Providers	-
19 i3	Virtual Asset Service Providers (VASPs)	-
19 i4	eCommerce Platforms	-
19 i5	Other - Please explain	-
19 j	Private Banking	Domestic
19 k	Remote Deposit Capture (RDC)	No
19 l	Sponsoring Private ATMs	No
19 m	Stored Value Instruments	No
19 n	Trade Finance	Yes
19 o	Virtual Assets	No. (Prohibited)
19 p	For each of the following please state whether you offer the service to walk-in customers and if so, the applicable level of due diligence:	
19 p1	Check cashing service	No
19 p1a	If yes, state the applicable level of due diligence	
19 p2	Wire transfers	No
19 p2a	If yes, state the applicable level of due diligence	
19 p3	Foreign currency conversion	No
19 p3a	If yes, state the applicable level of due diligence	
19 p4	Sale of Monetary Instruments	No
19 p4a	If yes, state the applicable level of due diligence	
19 p5	If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence.	-
19 q	Other high-risk products and services identified by the Entity (please specify)	-
20	Confirm that all responses provided in the above Section are representative of all the LE's branches.	Yes
20 a	If N, clarify which questions the difference/s relate to and the branches and subsidiaries that this applies to.	-
21	If appropriate, provide any additional information/context to the answers in this section.	

3. AML, CTF & SANCTIONS PROGRAMME		
22	Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:	
22 a	Appointed Officer with sufficient experience/expertise	Yes
22 b	Adverse Information Screening	Yes
22 c	Beneficial Ownership	Yes
22 d	Cash Reporting	Yes
22 e	CDD	Yes
22 f	EDD	Yes
22 g	Independent Testing	Yes
22 h	Periodic Review	Yes
22 i	Policies and Procedures	Yes
22 j	PEP Screening	Yes
22 k	Risk Assessment	Yes
22 l	Sanctions	Yes
22 m	Suspicious Activity Reporting	Yes
22 n	Training and Education	Yes
22 o	Transaction Monitoring	Yes
23	How many full time employees are in the Entity's AML, CTF & Sanctions Compliance Department?	11-100
24	Is the Entity's AML, CTF & Sanctions policy approved at least annually by the Board or equivalent Senior Management Committee? If N, describe your practice in Question 29.	Yes, at board level
25	Does the Board receive, assess, and challenge regular reporting on the status of the AML, CTF, & Sanctions programme?	Yes
26	Does the Entity use third parties to carry out any components of its AML, CTF & Sanctions programme?	No
26 a	If Y, provide further details	-
27	Does the entity have a whistleblower policy?	Yes
28	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
28 a	If N, clarify which questions the difference/s relate to and the branches and subsidiaries that this applies to.	-
29	If appropriate, provide any additional information/context to the answers in this section.	



4. ANTI BRIBERY & CORRUPTION		
30	Has the Entity documented policies and procedures consistent with applicable ABC regulations and requirements to reasonably prevent, detect and report bribery and corruption?	Yes
31	Does the Entity have an enterprise wide programme that sets minimum ABC standards?	Yes
32	Has the Entity appointed a designated officer or officers with sufficient experience/expertise responsible for coordinating the ABC programme?	Yes
33	Does the Entity have adequate staff with appropriate levels of experience/expertise to implement the ABC programme?	Yes
34	Is the Entity's ABC programme applicable to:	
35	Does the Entity have a global ABC policy that:	
35 a	Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage	Yes
35 b	Includes enhanced requirements regarding interaction with public officials?	Yes
35 c	Includes a prohibition against the falsification of books and records (this may be within the ABC policy or any other policy applicable to the Legal Entity)?	Yes
36	Does the Entity have controls in place to monitor the effectiveness of their ABC programme?	Yes
37	Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme?	Yes
38	Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months?	Yes
38 a	If N, provide the date when the last ABC EWRA was completed.	-
39	Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment?	Yes
40	Does the Entity's ABC EWRA cover the inherent risk components detailed below:	
40 a	Potential liability created by intermediaries and other third-party providers as appropriate	Yes
40 b	Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries	Yes
40 c	Transactions, products or services, including those that involve state-owned or state-controlled entities or public officials	Yes
40 d	Corruption risks associated with gifts and hospitality, hiring/internships, charitable donations and political contributions	Yes
40 e	Changes in business activities that may materially increase the Entity's corruption risk	Yes
41	Does the Entity's internal audit function or other independent third party cover ABC Policies and Procedures?	Yes
42	Does the Entity provide mandatory ABC training to:	
42 a	Board and senior Committee Management	Yes
42 b	1st Line of Defense	Yes
42 c	2nd Line of Defense	Yes
42 d	3rd Line of Defense	Yes
42 e	Third parties to which specific compliance activities subject to ABC risk have been outsourced	The Bank does not outsource any Compliance, AML, CTF, Sanctions or other ABC activities to third-parties.
42 f	Non-employed workers as appropriate (contractors/consultants)	Training is not provided directly to these parties by the Bank. However, the Bank ensures that the obligation to comply with relevant regulations is communicated to these parties, and they are expected to conduct their roles in line with the Bank's Compliance and ABC policies and requirements.
43	Does the Entity provide ABC training that is targeted to specific roles, responsibilities and activities?	Yes
44	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
44 a	If N, clarify which questions the difference/s relate to and the branches and subsidiaries that this applies	-
45	If appropriate, provide any additional information/context to the answers in this section.	

5. AML, CTF & SANCTIONS POLICIES & PROCEDURES

46	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report:	
46 a	Money laundering	Yes
46 b	Terrorist financing	Yes
46 c	Sanctions violations	Yes
46 d	Proliferation financing	Yes
46 e	Commercial Concealment	Yes
47	Are the Entity's policies and procedures updated at least annually?	Yes
48	Has the Entity chosen to compare its policies and procedures against:	The Bank follows local laws and regulations, FATF recommendations, and applicable international standards.
48 a	U.S. Standards	Yes, when relevant.
48 a1	If Y, does the Entity retain a record of the results?	Yes
48 b	EU Standards	Yes, when relevant.
48 b1	If Y, does the Entity retain a record of the results?	Yes
49	Does the Entity have policies and procedures that:	
49 a	Prohibit the opening and keeping of anonymous and fictitious named accounts	Yes
49 b	Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs	Yes
49 c	Prohibit dealing with other entities that provide banking services to unlicensed banks	Yes
49 d	Prohibit accounts/relationships with shell banks	Yes
49 e	Prohibit dealing with another entity that provides services to shell banks	Yes
49 f	Prohibit opening and keeping of accounts for Section 311 designated entities	Yes
49 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
49 h	Assess the risks of relationships with domestic and foreign PEPs, including their family and close associates	Yes
49 i	Define the process for escalating financial crime risk issues/potentially suspicious activity identified by employees	Yes
49 j	Define the process, where appropriate, for terminating existing customer relationships due to financial crime risk	Yes
49 k	Define the process for exiting clients for financial crime reasons that applies across the entity, including foreign branches and affiliates	Yes
49 l	Define the process and controls to identify and handle customers that were previously exited for financial crime reasons if they seek to re-establish a relationship	Yes
49 m	Outline the processes regarding screening for sanctions, PEPs and Adverse Media/Negative News	Yes
49 n	Outline the processes for the maintenance of internal "watchlists"	Yes
50	Has the Entity defined a risk tolerance statement or similar document which defines a risk boundary around their business?	Yes
51	Does the Entity have record retention procedures that comply with applicable laws?	Yes
51 a	If Y, what is the retention period?	5 years or more
52	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
52 a	If N, clarify which questions the difference/s relate to and the branches and subsidiaries that this applies	-
53	If appropriate, provide any additional information/context to the answers in this section.	

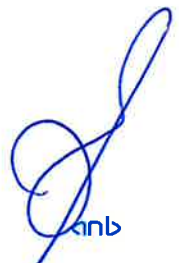


6. AML, CTF & SANCTIONS RISK ASSESSMENT		
54	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:	
54 a	Client	Yes
54 b	Product	Yes
54 c	Channel	Yes
54 d	Geography	Yes
55	Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below:	
55 a	Transaction Monitoring	Yes
55 b	Customer Due Diligence	Yes
55 c	PEP Identification	Yes
55 d	Transaction Screening	Yes
55 e	Name Screening against Adverse Media/Negative News	Yes
55 f	Training and Education	Yes
55 g	Governance	Yes
55 h	Management Information	Yes
56	Has the Entity's AML & CTF EWRA been completed in the last 12 months?	Yes
56 a	If N, provide the date when the last AML & CTF EWRA was completed.	-
57	Does the Entity's Sanctions EWRA cover the inherent risk components detailed below:	
57 a	Client	Yes
57 b	Product	Yes
57 c	Channel	Yes
57 d	Geography	Yes
58	Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below:	
58 a	Customer Due Diligence	Yes
58 b	Governance	Yes
58 c	List Management	Yes
58 d	Management Information	Yes
58 e	Name Screening	Yes
58 f	Transaction Screening	Yes
58 g	Training and Education	Yes
59	Has the Entity's Sanctions EWRA been completed in the last 12 months?	Yes
59 a	If N, provide the date when the last Sanctions EWRA was completed.	-
60	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
60 a	If N, clarify which questions the difference/s relate to and the branches and subsidiaries that this applies to.	-
61	If appropriate, provide any additional information/context to the answers in this section.	<p>The bank's AML risk assessment methodology offers a comprehensive and proactive approach to managing risks associated with money laundering, terrorism financing, proliferation financing, commercial concealment, sanctions, and other forms of financial crime. This methodology is designed in alignment with local regulations, the FATF recommendations, and international standards.</p> <p>The methodology leverages both an Enterprise-Wide Risk Assessment (EWRA) for an all-encompassing perspective of the bank's overall risk exposure, and Entity-Specific Risk Assessments (SRA) for a granular examination of individual entities such as customers, beneficial owners, correspondent banks, vendors, and third parties.</p> <p>The risk assessment extends to cover the risks associated with the nature and use of the bank's products, services, and transactions. Additionally, it takes into account the potential risks inherent to the delivery channels for these offerings. The methodology ensures that risk assessments are performed at the initiation of new client relationships, throughout the duration of these relationships, and whenever there are significant changes in their associated risks.</p> <p>Incorporating a scoring system based on mandatory and dominant risk factors, the methodology translates these scores into actionable risk ratings via the application of risk scorecards. This strategic approach supports the identification of potential areas of improvement in AML policies, guides the bank in determining its risk appetite, facilitates efficient allocation of resources, and aids in the formulation of risk mitigation strategies.</p>

7. KYC, CDD and EDD		
62	Does the Entity verify the identity of the customer?	Yes
63	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
64	Which of the following does the Entity gather and retain when conducting CDD? Select all that apply:	
64 a	Customer identification	Yes
64 b	Expected activity	Yes
64 c	Nature of business/employment	Yes
64 d	Ownership structure	Yes
64 e	Product usage	Yes
64 f	Purpose and nature of relationship	Yes
64 g	Source of funds	Yes
64 h	Source of wealth	Yes
65	Are each of the following identified:	
65 a	Ultimate beneficial ownership	Yes
65 a1	Are ultimate beneficial owners verified?	Yes
65 b	Authorized signatories (where applicable)	Yes
65 c	Key controllers	Yes
65 d	Other relevant parties	Yes
66	What is the Entity's minimum (lowest) threshold applied to beneficial ownership identification?	5%
67	Does the due diligence process result in customers receiving a risk classification?	Yes
67 a	If Y, what factors/criteria are used to determine the customer's risk classification? Select all that apply:	
67 a1	Product Usage	Yes
67 a2	Geography	Yes
67 a3	Business Type/Industry	Yes
67 a4	Legal Entity type	Yes
67 a5	Adverse Information	Yes
67 a6	Other (specify)	Services and Channels Subscribed Length of Relationship Behavioral Risk Customer Type Source of Funds Political Exposure
68	For high risk non-individual customers, is a site visit a part of your KYC process?	Yes
68 a	If Y, is this at:	
68 a1	Onboarding	Yes
68 a2	KYC renewal	Yes
68 a3	Trigger event	Yes
68 a4	Other	Yes
68 a4a	If yes, please specify "Other"	Site visits may also be conducted when enhanced due diligence (EDD) is required for high risk customers.
69	Does the Entity have a risk based approach to screening customers for Adverse Media/Negative News?	Yes
69 a	If Y, is this at:	
69 a1	Onboarding	Yes
69 a2	KYC renewal	Yes
69 a3	Trigger event	Yes
70	What is the method used by the Entity to screen for Adverse Media/Negative News?	The Bank applies a comprehensive approach to screen for Adverse Media/Negative News as part of the risk-based strategy. The process involves the use of automated media monitoring tools, global risk databases, manual research, public information, government resources, and internal databases.
71	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
71 a	If Y, is this at:	
71 a1	Onboarding	Yes
71 a2	KYC renewal	Yes
71 a3	Trigger event	Yes
72	What is the method used by the Entity to screen PEPs?	The Bank uses a combination of methods to screen for PEPs. This includes the use of automated tools that draw information from various global risk databases. Manual research may also be conducted as needed, particularly for high-risk clients or in response to specific concerns. Information from public sources and government resources is also utilized. Internally, the bank maintains databases storing customer information, which can be cross-referenced whenever new potential PEP matches arise.
73	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
74	Is KYC renewed at defined frequencies based on risk rating (Periodic Reviews)?	Yes
74 a	If yes, select all that apply:	
74 a1	Less than one year	Yes
74 a2	1 – 2 years	Yes
74 a3	3 – 4 years	Yes
74 a4	5 years or more	Yes
74 a5	Trigger-based or perpetual monitoring reviews	Yes

74 a6	Other (Please specify)	<p>The Bank maintains a regular period for reviewing customer profiles and transactions based on their respective risk categories. This rigorous and systematic approach ensures understanding of the bank's customers and their activities remains up-to-date.</p> <p>Low-risk customers are reviewed every five years, ensuring that records are updated and reflect the current state of affairs.</p> <p>Medium risk customers are reviewed more frequently, every three years, to account for potential changes in their circumstances that may elevate their risk profile.</p> <p>High-risk customers, given their complex nature and potential risk exposure, are reviewed annually. This high frequency of review allows us to swiftly detect and respond to any changes in their risk profile.</p> <p>Regardless of these periodic reviews, all customers' profiles and transactions are subject to additional reviews if there are significant changes to their profile, unusual or unexpected transaction patterns, or suspicions related to money laundering, terrorist financing, or sanctions violations.</p>
75	Does the Entity maintain and report metrics on current and past periodic or trigger event due diligence reviews?	Yes
76	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?	
76 a	Arms, defence, military	Do not have this category of customer or industry. The Bank deals with this category under strict restrictions. Only licensed entities by Saudi authorities are engaged. Thorough due diligence is performed before any relationship initiation, including regulatory standing, license validity, ultimate beneficial owners (UBOs) verification, their ownership structure and involvement of PEP, negative news screening, and ongoing monitoring.
76 b	Respondent Banks	Always subject to EDD
76 b1	If EDD or restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022?	The Bank maintains EDD practices following the local regulations and Wolfsberg Correspondent Banking Principles 2022. This involves gathering information about respondent banks, reputation, quality of supervision, their ownership structure, products and services, customer base, operating locations, and management. The Bank also evaluates the respondent bank's AML and CTF policies and controls and compliance with international standards. Regular reviews and updates of these EDD practices are carried out.
76 c	Embassies/Consulates	Classified as high risk by the Bank due to the international nature of their operations and potential exposure to foreign PEPs. EDD measures include enhanced identification and verification procedures, assessment of the nature and purpose of the relationship, ongoing monitoring, and increased transaction scrutiny.
76 d	Extractive industries	EDD on these sectors is based on a risk-based approach, EDD measures includes an assessment of the customer's business, location, products, and services, nature of the extracted resources, verifying their licenses, assessing their compliance history, supply chain risks, transparency of payments, beneficial ownership, source of funds, jurisdictions involved, their ownership structure and involvement of PEP and regular monitoring of transactions.
76 e	Gambling customers	Prohibited
76 f	General Trading Companies	EDD on risk-based approach, includes understanding their business model, the company's trading partners, jurisdictions of operation, beneficial owners, financial analysis, types of customers, and verifying necessary licenses, type of goods traded, the scale of operations, verification of business activities, increased scrutiny of transactions, and ongoing monitoring.
76 g	Marijuana-related Entities	Prohibited
76 h	MSB/MVTS customers	
76 i	Non-account customers	Do not have this category of customer or industry
76 j	Non-Government Organizations	EDD on risk-based approach, NGOs require special attention due to the diverse nature of their operations. The Bank carries out EDD to gain a deep understanding of the NGO's mission, source and use of funds, beneficial owners, beneficiaries, and geographies and sectors they operate in. This is complemented with regular reviews to ensure the NGO's operations align with its stated objectives.
76 k	Non-resident customers	The Bank deals with this category under strict restrictions, where only GCC citizens and entities are allowed, and are always subject to EDD. The Bank conducts thorough due diligence on their financial activities, source of wealth and funds, expected transaction behavior, and the nature and purpose of the business relationship.
76 l	Nuclear power	Prohibited
76 m	Payment Service Providers	Always subject to EDD, includes understanding their business model, customer demographics, typical transaction volumes, the jurisdictions they operate in, and their compliance with AML and CTF rules and regulations. The Bank also conducts ongoing monitoring of their transactions to identify any changes in their risk profile.
76 n	PEPs	EDD is always carried out for PEPs, close associates, and related persons due to the high-risk nature. This involves verification of their identity, business and family connections and an understanding of their source of wealth and funds and activities, assessing their public reputation and screening for any potential adverse media.
76 o	PEP Close Associates	The Bank requires approval from senior management and Compliance before establishing or continuing the relationship.
76 p	PEP Related	
76 q	Precious metals and stones	Given the inherent high-risk nature of the industry, the Bank conducts EDD for customers involved with precious metals and stones. This involves understanding their business and ownership structure, identifying and verifying the source of funds, their license, beneficial owners, understanding their supply chains, locations of operations and Jurisdictions involved, beneficial owners, ensuring compliance with international trade regulations, examining the transparency of their business practices, and conducting ongoing monitoring.
76 r	Red light businesses/Adult entertainment	Prohibited
76 s	Regulated charities	Restricted. The Bank undertakes a risk-based approach for regulated charities. Measures include reviewing their registration status, source of funds, stated objectives, operations, jurisdictions, understanding the purpose and intended nature of the relationship. Ongoing monitoring and enhanced transaction scrutiny to ensure that their activities align with their stated objectives.
76 t	Shell banks	Prohibited
76 u	Travel and Tour Companies	The Bank undertakes a risk-based approach. Measures include reviewing their source of funds, operations, jurisdictions, understanding the purpose and intended nature of the relationship, scrutinizing the transparency of their financial transactions, understanding their customer demographics, and ongoing monitoring of their transaction activities.
76 v	Unregulated charities	Prohibited
76 w	Used Car Dealers	The Bank performs EDD on used car dealers given their potential risk profile. Measures include verifying legal status, understanding the ownership, control structure and beneficial owners, assessing the business model, understanding the nature of business, verifying the source of funds, verifying their business operations, the transparency of their transactions, and conducting ongoing monitoring of their transactions.
76 x	Virtual Asset Service Providers	Prohibited

76 y	Trade Finance	<p>The Bank carries out meticulous due diligence and Enhanced Due Diligence for Trade Finance, leveraging a risk-based approach. Detailed analysis of the customer's identity, business model, trading partners, jurisdictions, types of goods and services, scale of operations, financial stability, and nature of business relationships are part of this process.</p> <p>Every element of the supply chain, from vessels and trucks to shipments and related documentation, undergoes thorough review. This includes the tracking of vessel movements, validation of involved entities, and detailed checking of documents related to transactions. Special attention is given to goods that may have dual-use or are subject to international sanctions.</p> <p>Sanctions screening is performed for all related parties, including customers, beneficial owners, trading partners, involved bank and third parties. Screening also includes transport vessels or vehicles, routes, and shipment destinations.</p> <p>The Bank adheres to international trade rules and standards, and conducts risk assessment for any involved third parties. Finally, the Bank has an ongoing monitoring process, keeping vigilant oversight on trade finance activities, with regular reviews determined by the risk profile of the customer and transaction.</p>
76 z	Other (specify)	<p>The Bank evaluates additional high-risk industries and customer segments based on its internal risk assessment and regulatory guidance. Where identified, these segments are also subject to EDD.</p>
77	If restricted, provide details of the restriction	<p>The Bank only engages with customers that are licensed entities by the Saudi Authorities. Restrictions also apply in terms of the types of products, services, and transactions permitted, with an escalation protocol in place for higher-risk relationships. This may involve additional layers of approval, increased monitoring, and limitations on the nature and volume of transactions.</p>
78	Does EDD require senior business management and/or compliance approval?	Yes
78 a	If Y indicate who provides the approval:	<p>EDD requires approval from senior business management and/or compliance. The approval authority depends on the risk classification of the customer, the nature of the products or services involved, and the potential risk exposure to the Bank. This ensures that the risks associated with high-risk customers or activities are understood and accepted at the appropriate level within the Bank.</p>
79	Does the Entity have specific procedures for onboarding entities that handle client money such as lawyers, accountants, consultants, real estate agents?	<p>Yes. This involves obtaining information about the nature of the client's professional activities, understanding their business models, the nature and purpose of their account, understanding the responsibilities they have regarding client money, and assessing the adequacy of their systems and controls.</p>
80	Does the Entity perform an additional control or quality review on clients subject to EDD?	<p>Yes. This includes periodic review and update of the customer risk profile, continuous transaction monitoring, and reevaluation of the business relationship if significant changes occur in the customer's operations or behavior.</p>
81	Confirm that all responses provided in the above Section are representative of all the LE's branches and subsidiaries	<p>Yes, All responses provided in this section are representative of all the Bank's branches and subsidiaries. The Bank maintains a unified approach across its network to ensure consistent adherence</p>
81 a	If N, clarify which questions the difference/s relate to and the branches and subsidiaries that this applies to	-
82	If appropriate, provide any additional information/context to the answers in this section.	<p>The Bank applies due diligence measures in accordance with the risk level associated with both customers and their transactions. This risk-based approach ensures rigorous scrutiny for higher risk profiles and transactions.</p> <p>Customer Risk:</p> <p>For low-risk profiles, the Bank applies Simplified Due Diligence measures, which involve basic identity verification, understanding the nature of the customer's business or employment, and monitoring their transactions. These customers undergo a regular review every five years, or when there are changes in their circumstances.</p> <p>Medium risk customers undergo a more comprehensive standard Customer Due Diligence process, which includes an in-depth understanding of the customer's profile and expected transaction behavior. Reviews for these customers occur on a triennial basis (every three years) or when significant changes to their profile occur.</p> <p>High-risk customers are subject to Enhanced Due Diligence procedures. This involves a more granular examination of the customer's profile, including a thorough understanding of their business relationships, sources of funds, geographical locations, and the nature of their industries. High-risk customers, including those with political affiliations or connections to high-risk sectors or countries, are reviewed annually or upon occurrence of a significant event, such as a change in ownership structure.</p> <p>Transaction Risk:</p> <p>In addition to customer risk, EDD is also applied on high-risk transactions. Such transactions are identified based on various parameters like transaction size, frequency, nature, geography, and parties involved. An EDD for high-risk transactions includes thorough scrutiny of the transaction's origin, purpose, beneficiaries, and involved parties.</p> <p>Regardless of the risk category, the due diligence process is also triggered whenever there are changes to the customer's circumstances, unusual or unexpected patterns in their transactions, or if there are suspicions of money laundering, terrorist financing, or sanctions violations.</p>



8. MONITORING & REPORTING		
83	Does the Entity have risk based policies, procedures and monitoring processes for the identification and reporting of suspicious activity?	Yes
84	What is the method used by the Entity to monitor transactions for suspicious activities?	Combination of automated and manual
84 a	If manual or combination selected, specify what type of transactions are monitored manually	Manual transaction monitoring processes are built around understanding typologies, indicators and red flags of suspicious activity, such as uncharacteristic transaction patterns, activities inconsistent with known customer profiles, and interactions with high-risk jurisdictions and relationships. These processes are complemented by transaction sampling, ad hoc reviews in response to alerts, and regular reviews for continual adjustments of monitoring thresholds and parameters. Working alongside automated systems, these practices form a robust and comprehensive monitoring
84 b	If automated or combination selected, are internal system or vendor-sourced tools used?	Vendor-sourced tools
84 b1	If 'Vendor-sourced tool' or 'Both' selected, what is the name of the vendor/tool?	AML SAS
84 b2	When was the tool last updated?	< 1 year
84 b3	When was the automated Transaction Monitoring application last calibrated?	< 1 year
85	Does the Entity have regulatory requirements to report suspicious transactions?	Yes
85 a	If Y, does the Entity have policies, procedures and processes to comply with suspicious transaction reporting requirements?	Yes
86	Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity?	Yes
87	Does the Entity have a data quality management programme to ensure that complete data for all transactions are subject to monitoring?	Yes
88	Does the Entity have processes in place to respond to Request For Information (RFIs) from other entities in a timely manner?	Yes
89	Does the Entity have processes in place to send Requests for Information (RFIs) to their customers in a timely manner?	Yes
90	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
90 a	If N, clarify which questions the difference/s relate to and the branches and subsidiaries that this applies to	All operate under the same policies and procedures as outlined above.
91	If appropriate, provide any additional information/context to the answers in this section.	

9. PAYMENT TRANSPARENCY		
92	Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards?	Yes
93	Does the Entity have policies, procedures and processes to comply with and have controls in place to ensure compliance with:	
93 a	FATF Recommendation 16	Yes
93 b	Local Regulations	Yes
93 b1	If Y, specify the regulation	The Bank complies with local regulations, including the "Anti-Money Laundering Law," the "Law of Combating the Crimes of Terrorism Financing," their implementing regulations, and directives issued by the Saudi Central Bank. These directives encompass "Wire Transfer Instructions" and the Rules and Guidance Governing AML and CTF emphasizing the importance of transparency in payment transactions and accuracy of information
93 c	If N, explain	-
94	Does the Entity have controls to support the inclusion of required and accurate originator information in cross border payment messages?	Yes
95	Does the Entity have controls to support the inclusion of required beneficiary information cross-border payment messages?	Yes
95 a	If Y, does the Entity have procedures to include beneficiary address including country in cross border payments?	Yes
96	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
96 a	If N, clarify which questions the difference/s relate to and the branches and subsidiaries that this applies to.	-
97	If appropriate, provide any additional information/context to the answers in this section.	



10. SANCTIONS		
98	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
99	Does the Entity have policies, procedures, or other controls reasonably designed to prevent the use of another entity's accounts or services in a manner causing the other entity to violate sanctions prohibitions applicable to the other entity (including prohibitions within the other entity's local jurisdiction)?	Yes
100	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
101	Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists?	Yes
102	What is the method used by the Entity for sanctions screening?	All banking relationships, including customers and transactions, are thoroughly screened during onboarding/initiation and periodically thereafter. This process uses a combination of automated systems and manual investigations to cross-reference all banking relationships against PEP lists, UN and local sanctions lists, relevant international lists and databases, and negative news sources. If a potential link to sanctions arises from these automated screenings, additional manual reviews are conducted. These manual investigations provide an added layer of assurance, helping to resolve ambiguities and confirm or rule out sanctions links. Any confirmed link to sanctions triggers the implementation of suitable measures in accordance with the AML policy.
102 a	If 'automated' or 'both automated and manual' selected:	
102 a1	Are internal system of vendor-sourced tools	Both
102 a1a	If a 'vendor-sourced tool' or 'both' selected, what is the name of the vendor/tool?	HOTSCAN CGI, SWIFT Screening tool and in-house solution
102 a2	When did you last test the effectiveness (of finding true matches) and completeness (lack of missing data) of the matching configuration of the automated tool? (If 'Other' please explain in Question 110)	< 1 year
103	Does the Entity screen all sanctions relevant data, including at a minimum, entity and location information, contained in cross border transactions against Sanctions Lists?	Yes
104	What is the method used by the Entity?	All transaction-related data, including details pertaining to the entity, location products, services, are screened against sanction lists. Similar to customer screening, this process involves both automated and manual methods. Initial screenings are automated, encompassing all transactions to identify any potential sanctions linkages. In instances where automated processes flag potential links or risks, it triggers a more in-depth manual investigation to ensure a thorough understanding of the transactional information. This comprehensive review ensures all transactions adhere to sanctions regulations. Any confirmed links to sanctions result in appropriate responsive measures, aligning with AML policy.
105	Does the Entity have a data quality management programme to ensure that complete data for all transactions are subject to sanctions screening?	Yes
106	Select the Sanctions Lists used by the Entity in its sanctions screening processes:	
106 a	Consolidated United Nations Security Council Sanctions List (UN)	Used for screening customers and beneficial owners and for filtering transactional data
106 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
106 c	Office of Financial Sanctions Implementation HMT (OFSI)	Used for screening customers and beneficial owners and for filtering transactional data
106 d	European Union Consolidated List (EU)	Used for screening customers and beneficial owners and for filtering transactional data
106 e	Lists maintained by other G7 member countries	Used for screening customers and beneficial owners and for filtering transactional data when applicable
106 f	Other (specify)	Local lists, other relevant international databases and lists when applicable
107	When regulatory authorities make updates to their Sanctions list, how many business days before the entity updates their active manual and/or automated screening systems against:	
107 a	Customer Data	Same day to 2 business days
107 b	Transactions	Same day to 2 business days
108	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?	No
109	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
109 a	If N, clarify which questions the difference/s relate to and the branches and subsidiaries that this applies	-
110	If appropriate, provide any additional information/context to the answers in this section.	To ensure the utmost accuracy in sanctions screening, a diligent process is in place to regularly test the effectiveness and completeness of the automated tools. This process includes evaluating the systems ability to identify true matches and its proficiency in ensuring no data is overlooked. Tests are conducted periodically and whenever major updates or changes are made to the system or the underlying data.

11. TRAINING & EDUCATION		
111	Does the Entity provide mandatory training, which includes:	
111 a	Identification and reporting of transactions to government authorities	Yes
111 b	Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered	Yes
111 c	Internal policies for controlling money laundering, terrorist financing and sanctions violations	Yes
111 d	New issues that occur in the market, e.g. significant regulatory actions or new regulations	Yes
111 e	Conduct and Culture	Yes
111 f	Fraud	Yes
112	Is the above mandatory training provided to :	
112 a	Board and Senior Committee Management	Yes
112 b	1st Line of Defence	Yes
112 c	2nd Line of Defence	Yes
112 d	3rd Line of Defence	Yes
112 e	Third parties to which specific FCC activities have been outsourced	The Bank does not outsource any Compliance, AML, CTF, Sanctions or other FCC activities to third-parties.
112 f	Non-employed workers (contractors/consultants)	Training is not provided directly to these parties by the Bank. However, the Bank ensures that the obligation to comply with relevant regulations is communicated to these parties, and they are expected to conduct their roles in line with the Bank's Compliance, AML, CTF, and Sanctions policies and requirements.
113	Does the Entity provide AML, CTF & Sanctions training that is targeted to specific roles, responsibilities and high risk products, services and activities?	Yes
114	Does the Entity provide customized training for AML, CTF and Sanctions staff?	Yes
114 a	If Y, how frequently is training delivered?	Annually
115	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
115 a	If N, clarify which questions the difference/s relate to and the branches and subsidiaries that this applies to.	-
116	If appropriate, provide any additional information/context to the answers in this section.	
12. QUALITY ASSURANCE /COMPLIANCE TESTING		
117	Does the Entity have a program wide risk based Quality Assurance programme for financial crime (separate from the independent Audit function)?	Yes
118	Does the Entity have a program wide risk based Compliance Testing process (separate from the independent Audit function)?	Yes
119	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
119 a	If N, clarify which questions the difference/s relate to and the branches and subsidiaries that this applies to.	-
120	If appropriate, provide any additional information/context to the answers in this section.	

13. AUDIT		
121	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
122	How often is the Entity audited on its AML, CTF, ABC, Fraud and Sanctions programme by the following:	
122 a	Internal Audit Department	Yearly
122 b	External Third Party	Yearly
123	Does the internal audit function or other independent third party cover the following areas:	
123 a	AML, CTF, ABC, Fraud and Sanctions policy and procedures	Yes
123 b	Enterprise Wide Risk Assessment	Yes
123 c	Governance	Yes
123 d	KYC/CDD/EDD and underlying methodologies	Yes
123 e	Name Screening & List Management	Yes
123 f	Reporting/Metrics & Management Information	Yes
123 g	Suspicious Activity Filing	Yes
123 h	Technology	Yes
123 i	Transaction Monitoring	Yes
123 j	Transaction Screening including for sanctions	Yes
123 k	Training & Education	Yes
123 l	Other (specify)	-
124	Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness?	Yes
125	Confirm that all responses provided in the above section are representative of all the LE's branches	Yes
125 a	If N, clarify which questions the difference/s relate to and the branches and subsidiaries that this applies to.	-
126	If appropriate, provide any additional information/context to the answers in this section.	
14. FRAUD		
127	Does the Entity have policies in place addressing fraud risk?	Yes
128	Does the Entity have a dedicated team responsible for preventing & detecting fraud?	Yes
129	Does the Entity have real time monitoring to detect fraud?	Yes
130	Do the Entity's processes include gathering additional information to support its fraud controls, for example: IP address, GPS location, and/or device ID?	Yes
131	Confirm that all responses provided in the above section are representative of all the LE's branches	Yes
131 a	If N, clarify which questions the difference/s relate to and the branches and subsidiaries that this applies to.	-
132	If appropriate, provide any additional information/context to the answers in this section.	



Declaration Statement

Wolfsberg Group Correspondent Banking Due Diligence Questionnaire 2023 (CBDDQ V1.4)

Arab National Bank, is fully committed to the fight against financial crime and makes every effort to remain in full compliance with all applicable financial crime laws, regulations and standards in all of the jurisdictions in which it does business and holds accounts.

Arab National Bank understands the critical importance of having effective and sustainable controls to combat financial crime in order to protect its reputation and to meet its legal and regulatory obligations.


Arab National Bank recognizes the importance of transparency regarding parties to transactions in international payments and has adopted/is committed to adopting these standards.

Arab National Bank further certifies it complies with / is working to comply with the Wolfsberg Correspondent Banking Principles and the Wolfsberg Trade Finance Principles. The information provided in this Wolfsberg CBDDQ will be kept current and will be updated no less frequently than every eighteen months.

Arab National Bank commits to file accurate supplemental information on a timely basis.

I, Khalid A. Alturki (Head of Financial Institutions), certify that I have read and understood this declaration, that the answers provided in this Wolfsberg CBDDQ are complete and correct to my honest belief, and that I am authorized to execute this declaration on behalf of Arab National Bank.

I, Waleed M. Alkhulayfi (Chief Compliance Officer), certify that I have read and understood this declaration, that the answers provided in this Wolfsberg CBDDQ are complete and correct to my honest belief, and that I am authorized to execute this declaration on behalf of Arab National Bank.

 10/7/2023 (Signature & Date)

 (Signature & Date)

