

Anti-Money Laundering Declaration



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شعار البنك الأول هو علامة تجارية مسجلة باسم البنك السعودي البريطاني. وطبقاً لأحكام المادة 192 من نظام الشركات، فإن أي إشارة إلى البنك الأول كطرف متعاقد معه في هذه الوثيقة سوف تفسر بعد الاندماج كإشارة إلى البنك السعودي البريطاني س.ت رقم 1010025779 كطرف متعاقد معه.

1. Name of Institution: Alawal Bank
2. Address of Head Office: Dhabab Street P.O. Box 1467 Riaydh 11431 Saudi Arabia
3. Website: www.alawalbank.com
4. Core Business: Bank Operations
5. Name of Regulatory Body: Saudi Arabian Monetary Agency
6. Number of Branches:
 - Domestic : 67 domestic Branches
 - Foreign : N/A

1. Name of the Regulatory body:

The central Bank of the Kingdom of Saudi Arabia: Saudi Arabian Monetary Agency (SAMA)
www.sama.gov.sa/indexe.htm

2. Is Money Laundering Considered, by laws and regulations, as a crime?

Yes

3. Is the bank required by any local or international law(s) to establish an AML program? If so, please identify the applicable laws and/or regulations.

Saudi Arabian Monetary Agency's (SAMA) Anti Money Laundering/Combating Terrorist Financing Guidelines that were based on Saudi Arabia Anti Money Laundering ("AML") law issued in 2003. The Rules are in accordance with FATF 40 Recommendations, the 8 Special Recommendations on Terrorist Financing, and all UN Security Council Resolutions.

4. Does your country's regulatory body (Central Bank) require all financial institutions to have Anti Money Laundering (AML) and Know Your Customers (KYC) procedures? If so, is your Institution in compliance with AML and KYC rules.

Yes

5. Has the bank adopted a Know Your Customer - KYC or Customer Identification Policy that applies to its client relationships?

Yes. The AML/ CTF policy sets out the Customer Acceptance Policy, which sets out the minimum criteria to be adhered when opening new accounts or when establishing any new relationships.

6. Is the Bank listed on a Stock Exchange? If yes, please provide the name of the Stock Exchange.

Yes, Alawal Bank is listed in Tadawul (Saudi Arabian Stock Exchange)

7. Has the bank developed written AML, Combating Terrorist Financing (CTF) and Know-Your-Client (KYC) policies, which have been approved by the Management Committee of the Bank?

The bank has developed written AML, CTF and KYC policies, which have been approved by the Management Committee of the Bank.

8. Has The Board been informed that these policies were approved and are in force and are consistent with SAMA requirements?

The Board has been informed that these policies were approved and are in force and are consistent with SAMA requirements.

9. Does SAMA incorporate all FATF recommendations in its AML policy and requirements?

SAMA incorporates all FATF recommendations in its AML policy requirements.

10. Does the bank develop AML/KYC/CTF procedures to support its policies and assist in the detection of money laundering or terrorist financing activities?

Alawal Bank has developed comprehensive AML/KYC/CTF procedures to support its policies and to assist in the detection of money laundering or terrorist financing activities.

11. Is the bank fully compliant with SAMA and the FATF 49 recommendations?

Alawwal Bank is fully compliant with SAMA and the FATF recommendations.

12. Do you have an established Audit and Compliance function to monitor and review the effectiveness of AML policies and procedures?

Alawwal Bank has an established independent Internal Audit function that reports directly to the Board Audit Committee, and additionally has a separate compliance function to monitor and review the effectiveness of AML/KYC/CTF policies and procedures.

13. Do you have an established method of reporting suspicious activities / transactions to the appropriate regulators / law enforcement agency?

Alawwal Bank has an established method of reporting suspicious activities to Saudi FIU and SAMA via our appointed Money Laundering Reporting Officer, consistent with the regulations and requirements of SAMA.

14. Do you apply the AML and CTF policies to the head office, overseas branches and majority owned subsidiaries?

Alawwal Bank applies its AML and the CTF policies to its head office and domestic branches. Alawwal Bank has no overseas branches and subsidiaries.

15. Does the Bank have a compliance officer appointed to oversee anti-money laundering arrangements? If so please provide us with his / her details?

The bank has a Chief Compliance Officer responsible for managing anti-money laundering operations. In addition to a Money Laundering Reporting Officer responsible for reporting suspicious cases to authority.

16. Is the bank having an automated system to monitor suspicious activity?

Yes we do have an automated system for monitoring account activities and generate alerts and reports.

17. Does Internal Audit review the AML process regularly?

Internal Audit reviews the AML process regularly (at least annually as per SAMA requirements). Issues noted and the agreed management actions to remedy issues are reported to senior management and the Board. Compliance is responsible for implementing any remedial action or improvements recommended.

18. Is the Bank able to confirm that it does not maintain relationships with 'shell banks' (defined as a bank without a physical presence and not affiliated to a regulated bank that does not maintain a physical presence)?

Alawwal Bank confirms not dealing with shell banks.

19. How long does the Bank keep records of customer and account beneficiaries' identification, transaction history?

Record retention in Saudi Arabia and at Alawwal Bank is for a minimum of 10 years in any event and in specific cases the retention period is permanent.

20. Please list the names of your principal shareholders (in excess of 20%), senior management and their primary functions and backgrounds.

Alawwal Bank is a publicly listed company in Tadawul and the Board of members are listed in the table below.

21. In relation to cross-border correspondent banking and other similar relationships, does your institution gather sufficient information about respondent institution to understand their business, reputation, quality of supervision and regulatory history?

Yes, all relevant KYC information is obtained from correspondent banks.

22. Does Alawwal Bank open anonymous or numbered accounts?

No, we do not open anonymous or numbered accounts.

23. Does the Bank require complete information of outgoing wire transfer instructions, including sender and beneficiary names, address, account numbers, and purpose?

Yes, Alawwal Bank require complete information of outgoing wire transfer instructions.

24. Is training provided to all staff handling customer accounts and related functions?

Yes, AML training is mandatory for all bank staff.

25. Has your institution been subject to sanctions or punitive actions - related to anti-money laundering or terrorist financing - by the regulator or law enforcement in the past five years?

No

26. Names of any share holders holding excess of 5%

- RBS N.V (Formerly known as ABN AMRO N.V) 40%
- Al Olayan Group, Saudi Arabia 21.76%
- General organization for Social Insurance 10.50%

27. Board of Directors

1. Mr. Mubarak Abdullah Al-Khafrah
2. Mrs. Lubna Sulaiman Al-Olayan
3. Mr. Sulaiman Abdullah Al-Kadi
4. Mr. Abdulhadi Ali Shayif
5. Mr. Soren Kring Nikolajsen, Managing Director
6. Mr. Frank Vermeulen
7. Mr. Ahmed Al Olaqie
8. Mr. Javier Maldonado
9. Mr. Martin Powell

28. Sources of further general information:

Please refer to the bank website: www.alawwalbank.com

Maha Al-Sudairi

Chief Compliance Officer



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