

Following your request for a summary of Financial Crime Compliance policies and procedures, including completion of your AML questionnaires, please find information in the below sections regarding National Bank of Kuwait (Int'l) PLC (NBKI)'s board of directors and the Bank's internal policies and procedures.

NBKI Board Membership

We confirm that NBKI is owned 100% by National Bank of Kuwait S.A.K.P in Kuwait, and that no individual shareholder owns more than 10% of the shares.

NBKI Board membership is available via the FCA register, as our Board holds regulated functions.

NBKI AML Policy, which includes the following points:

We are a Financial Conduct Authority (FCA) (FRN 171532) regulated firm that abides by the rules and regulations set out in the United Kingdom.

We confirm that our internal Policies and Procedures are not available publicly.

We also confirm that our procedures were reviewed as part of our regulatory visit by the FCA in May 2019.

In addition to the above, we confirm the following points –

KYC Procedures:

Our KYC procedures are reviewed by the Financial Crime and AML teams on a regular basis and at least annually. Any alterations are circulated to all relevant members of staff and training given where necessary.

All procedures are also available on the Bank's internal intranet page, which is accessible to all staff.

Segmentation by Client Risk:

An initial customer risk rating is carried out at onboarding stage, with customers categorised into four risk categories, namely low, medium, high and very high, with the following review timeframes:

- Low risk: every five years
- Medium risk: every three years
- High risk: every year
- Very high risk: every six months

Customers are also reviewed at trigger event stage (such as change to customer account, new account request, reactivation of blocked/inactive accounts).

Treatment of PEPs:

All PEPs are subject to enhanced due diligence and are monitored and reviewed at least annually. As part of this review, updated customer risk ratings are performed, alongside new World-Check and adverse media checks.

Sanctions checks are performed on a nightly basis against Eastnets Safewatch. Additionally, the NBKI customer database is screened against World-Check PEP lists on a monthly basis, alongside quarterly screening of the Bank's PEP list for any adverse media.

Anti-Bribery and Corruption

NBKI has policies and procedures for the prevention of Bribery and Corruption. These policies and procedures mandate strict adherence to the provisions of the UK Bribery Act 2010 and other relevant legislation. The policy sets out standards in respect of:

- Scope
- Legislation and Legal Requirements
- Proportionate Procedures
- Board and Senior Management Commitment
- Risk Assessment
- Due Diligence
- Communication (including training)
- Monitoring and review protocols
- Conduct
- Roles and Responsibilities
- Reporting and Escalation
- Record Keeping

Operations Monitoring Procedure:

NBKI employs the use of Oracle Mantas transaction/KYC monitoring software. This monitoring programme reviews all customer transactions against pre-determined scenarios and enables us to map transaction usage.

Customer Acceptance Policies (definition of prohibited clients):

NBKI defines prohibited clients as any individual named on a sanctioned listing, as well as individuals who do not fit into the NBKI profile, which has been set up to service existing NBK customers in the United Kingdom.

Individuals involved in certain industries have also been prohibited, such as arms dealing and money service businesses.

Definition of High Risk Clients, Enhanced Measures and Specific Controls:

High risk customers are determined by a risk assessment process which incorporates all risk criteria contained in the Joint Money Laundering Steering Group Guidance. All high risk customers are subject to enhanced due diligence at take-on and are subject to subsequent monitoring.

The enhanced due diligence process includes:

- Evidence of a person (passport)
- Evidence of the home address (civil identification card for Kuwaiti individuals)
- Evidence of source of wealth and ongoing funding (this may include property deeds, bank statements, inheritance documents, publicly available information, accounts, knowledge from the account officers in Kuwait and other NBK offices, publicly available information via Google and company websites, external independent reports).

Controls in place over persons and sanctioned countries:

All customers and transactions are checked on a daily basis against Eastnets Safewatch, which incorporates UN, EU, OFAC and HMT sanction listings.

Audit Systems Regarding Financial Crime Compliance Policy and Procedures:

Our most recent internal audit took place in October 2024. The outcome was a Satisfactory rating.

Statement Limitations and Restrictions

This statement is provided without any liability on behalf of National Bank of Kuwait (International) PLC or its officers. Recipients should conduct their own due diligence before relying on the information provided. The information contained in this statement is confidential and intended solely for the recipient. Any unauthorised disclosure, copying, distribution or reliance on the contents of this statement are strictly prohibited. Please be advised that the information provided in this statement is subject to applicable UK and EU data protection laws and is solely for use by the recipient. It is NBKI's expectation that the recipient will ensure that this statement is subject to data protection measures. Any use, dissemination, or disclosure of this statement to third parties is strictly prohibited without NBKI's prior written consent.

Kind regards,

Andrew Jackson

Money Laundering Reporting Officer