the Wolfsberg Group

Financial Institution Name: Location (Country): Kuwait Financial Centre K.P.S.C. Kuwait

No#	Question	Answer
1. ENTITY	& OWNERSHIP	
1	Full Legal name	Kuwait Financial Centre K.P.S.C.
2	Append a list of foreign branches which are covered by this questionnaire	All
3	Full Legal (Registered) Address	Murgab, Alsoor St., Burj AlShayaa, Floor 8, Kuwait City, Kuwait
4	Full Primary Business Address (if different from above)	Murgab, Alsoor St., Burj AlShayaa, Floor 8, Kuwait City, Kuwait
5	Date of Entity incorporation/establishment	22nd October 1974
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	Boursa Kuwait, Security Code 213, Ticker 'Markaz'
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	Check disclosure on major shareholders on our website at https://www.markaz.com/en/investor-relations/major-shareholder-and-divide nds/
7	% of the Entity's total shares composed of bearer shares	None
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	Not Applicable
9	Does the Bank have a Virtual Bank License or provide services only through online channels?	No
10	Provide Legal Entity Identifier (LEI) if available	LEI: 254900SB8A6UBTR73D96
	TF & SANCTIONS PROGRAMME	
2 AMI C.		
2. AML, C	Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:	
	minimum AML, CTF and Sanctions standards	Yes
11	minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient	Yes Yes
11 a	minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise	
11 a 11 b 11 c 11 d	minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening	Yes
11 a 11 b 11 c	minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership	Yes Yes

11 g Independent Festing Yes 11 h Potoice Review Yes 11 1 Potoice and Procedures Yes 11 J PS Screening Yes 11 Section 1 Section 1 Yes 11 Section 1 Section 1 Yes 11 Section 1 Yes 12 Is the Entity a Mall, CIT & Section policy approved at a least annually by the Board or equivalent Senior Management Committee? 13 Does the Entity use that parties to carry out any components of its AML, CIT & Senior Institute 1 Yes 13 If Y, provide further details 14 Does the entity have a whistleblower policy? 15 Is It BRIBERY & CORRUPTION 16 Has the Entity documented policies and procedures 17 Committee 1 Yes 18 Section 1 Yes 18 Section 1 Yes 19 Does the Entity territies Management Yes 19 Section 1 Yes 19 Section 2 Yes 19 Section 1 Yes 19 Section 2 Yes 19 Section 2 Yes 19 Section 2 Yes 19 Section 2 Yes 19 Section 3 Yes 19 Section 4 Yes 19 Section 3 Yes 19 Section 4 Yes 19 Section 3 Yes 19 Section 3 Yes 19 Section 4 Yes 19 Section 4 Yes 19 Section 4 Yes 19 Section 3 Yes 19 Section 3 Yes 19 Section 3 Yes 19 Section 4 Yes 19 Section 4 Yes 19 Section 5 Yes 19 Section 6 Yes 19 Section	44	1	Tu.
Policies and Procedures Yes	_	·	
11 I N. Risk Assessment Yes 11 I N. Sanctions Yes 11 I Sanctions Yes 11 I N. Training and Education Yes 12 Is the Entity's AMI, CTF & Sanctions policy approved at least annually by the Board or equivalent Senior Management Committee? 13 Does the Entity was third parties to carry out any components of its AMI, CTF & Sanctions 13 Proposed further details Not Applicable 14 Does the entity have a whistleblower policy? Yes 15 In The Entity to courseled policies and procedures 16 Does the Entity to the Entity of the Sanctions and report before year does not proceed the Committee 17 Does the Entity is returned audit function or other 18 Procedure? Procedure? Yes 18 List Line of Defence Yes 19 Des the Entity to the provide mandation 19 Des the Entity is returned audit function or yes 19 Descriptions Procedure 19 Descriptions			
11 II Sourcions Yes 11 m Suspicious Activity Reporting Yes 11 m Training and Education Yes 11 n Training and Education Yes 11 o Training and Education Yes 12 Is the Entity's AML, CTF & Sanctions policy approved at least annually by the Board or equivalent Senior Management Committee? 13 Obes the Entity to set third parties to carry out any components of its AML, CTF & Sanctions programme? 13 a If Y, provide further details 14 Does the entity have a whistletiower policy? Yes 14 Does the entity have a whistletiower policy? Yes 15 Has the Entity documented policies and procedures consistent with applicable ABC regulations and report bribary and corruption? 16 Does the Entity intermed policies and procedures consistent with applicable ABC regulations and report bribary and corruption? 17 Does the Entity provide mandiatory ABC training to: 17 a Board and Senior Committee Management Yes 17 b Tat Line of Defence Yes 17 d June of Celerica Yes 17 d June of Celerica Yes 17 d June of Celerica Yes 18 d June of Line of Defence Yes 19 d Tat Line of Defence Yes 19 d Tat Line of Defence Yes 19 d Tat Line of Defence Yes 10 d Tat Line of Defence Yes 11 d Tat Line of Defence Yes 12 d Tat Line of Defence Yes 13 d Tat Line of Defence Yes 14 d Tat Line of Defence Yes 15 d Tat Line of Defence Yes 16 d Tat Line of Defence Yes 17 d Tat Line of Defence Yes 18 d Monagement Yes appropriate Yes 19 d Problit the engine has been defended by Ambroad Hambard All Line America Hambard			
11 II Sanctions Yes 11 II Training and Education Yes 11 IO Training and Education Yes 12 II Is the Entify's ANL, CTF & Sanctions policy approved at least annually by the Board or equivilent Senior Management Committee? Yes 13 Oce the Entify use in Entify use in Entify the Interfect to committee? No 13 a If Y, provide further details Not Applicable 14 Does the entify have a whistleblower policy? Yes 3. ANTI BRISERY & CORRUPTION Yes 15 Has the Entify documented policiles and procedures consistent with applicable ABC regulation and regulariements to reasonably prevent, detect and report belony and compilent? Yes 16 Does the Entify provide mandatory ABC training to: Indicate the Interference of the Entify provide mandatory ABC training to: Interference of the Entify provide mandatory ABC training to: Interference of the Entify provide mandatory ABC training to: Yes 17 Does the Entify provide mandatory ABC training to: Interference of the Entify provide mandatory ABC training to: Yes 17 Does the Entify provide mandatory ABC training to: Yes 17 Does the Entify provide mandatory ABC training to: Yes 17 Does the Entify provide mandatory ABC training to: Yes 17 Does the Entify provide mandatory ABC training to: Yes 17 Does the Entify			
11 m Training and Education			Yes
11 n Training and Education Yes 11 o Training and Education Yes 12 st the Entity's ANL CTF & Sanctions policy approved at least annually by the Board or equivalent Senior Management Committee? 13 Oose the Entity use thirt parties to carry out any components of its ANL, CTF & Sanctions programme? 13 a If Y, provide further details Nor Applicable 14 Does the entity have a whistleticwer policy? 15 ANTI BRIBERY & CORRUPTION 15 Has the Entity documented policies and procedures consistent with applicable ABC regulations and report betwey and corruption? 16 Does the Entity's internal audit function or other independent third party over ABC Policies and Procedures? 17 Oos the Entity's internal audit function or other independent third party over ABC Policies and Procedures? 17 Does the Entity provide mandatory ABC training to: 18 Board and Senior Committee Management Yes 19 Card Line of Defence Yes 17 d 3rd Line of Defence Yes 18 has the Entity documents to reasonably prevent, detect and report to ABC risk hapedite compliance activities subject to ABC risk hapedite policies and reported to ABC risk hapedite or ABC risk hapedi			Yes
Transaction Monitoring Yes		Suspicious Activity Reporting	Yes
st the Entity's AALL_CTF & Sanctions policy approved at least amusually by the Board or equivalent Senior Management Committee? 13 Dees the Entity does the politics become or you any components of its AML_CTF & Sanctions programme? 13 a If Y, provide further details Not Applicable 14 Does the entity have a whistleblower policy? Yes 15 a Not BRISERY & CORRUPTION 16 Has the Entity documented policies and procedures consistent with applicable ABC regulations and requirements to reasonably prevent, detect and report bribary and corruption? 16 Does the Entity internal audit function or other independent third party cover ABC Policies and Procedures? 17 Does the Entity browder mandatory ABC training to: 18 a Board and Senior Committee Management 19 a Board and Senior Committee Management 19 a Stat Line of Defence Yes 17 d Stat Line of Defence Yes 17 d Stat Line of Defence Yes 17 d Stat Line of Defence Yes 17 a Stat Line of Defence Yes 18 a Line of Defence Yes 19 a Stat Line of Defence Yes 19 a Manual Carlos ABC resistance and procedures subject to ABC risk have been utsourced for membrour and processes and procedures the State of Procedure ABC or State Developed ABC regulations and requirements to reasonably prevent, detect and report: 19 a Manual Carlos ABAC Trial Stanctions regulations and requirements to reasonably prevent, detect and report: 19 a Prohibit the opening and keeping of accounts for unitionesed banks and of NBT's 19 a Prohibit the opening and keeping of accounts for unitionesed banks and of NBT's 19 a Prohibit the opening and keeping of accounts for unitionesed banks and of NBT's 19 a Prohibit december of the errotties that provide banks of Prohibit committee and procedures that foreign personal procedures that foreign personal p	11 n	Training and Education	Yes
af losat annually by the Board or equivalent Senior Management Committee? 13 Does the Entity use third porties to carry out any concentration is AML, CTF & Sanctions programme? 13 a If Y, provide further details Not Applicable Yes 3. ANTI BRIBERY & CORRUPTION 15 Has the Entity documented policies and procedures consistent with applicable ABC regulations and report pribrely and computions and report pribrely and complete ABC regulations and report provide mandatory ABC training to: 17 a Does the Entity provide mandatory ABC training to: 17 a Beard and Senior Committee Management Yes 17 b 1st Line of Defence Yes 17 d 3rd Line of Defence Yes 17 d Non-employed workers as appropriate (contractoracionsularis) Non-employed workers as appropriate (contractoracionsularis) Non-employed workers as appropriate (contractoracionsularis) 18 a Money Issundering 18 b Terroitst financing Yes 18 a Money Issundering 19 b Prohibit the opening and keeping of accounts for unlicensed banks and requirements to reasonably prevent, detect and report 19 a Prohibit depening and keeping of accounts for unlicensed banks and contractorsulations and requirements to reasonably Provide services to shell banks. 19 a Prohibit depening and keeping of accounts for Ses 19 a Prohibit depening and keeping of accounts for Ses 19 a Prohibit depening and keeping of accounts for Ses 20 and and deficience ABC Ses 20 and deficience ABC Ses 20 and deficie	11 o	Transaction Monitoring	Yes
components of its AML, CTF & Sanctions programme? 13 a If Y, provide further details 14 Does the entity have a whistleblower policy? Yes 3. ANTI BRIBERY & CORRUPTION 15 Has the Entity documented policies and procedures consistent with applicable ABC regulations and requirements to reasonably prevent, detect and report bribery and corruption? 16 Does the Entity in the entity and the entity of the enti	12	at least annually by the Board or equivalent Senior	Yes
14 Does the entity have a whistleblower policy? 3. ANTI BRIBERY & CORRUPTION 15 Has the Entity documented policies and procedures consistent with applicable ABC regulations and requirements to reasonably prevent, detect and report procedures? 16 Does the Entity internal audit function or other independent third party cover ABC Policies and Procedures? 17 Does the Entity provide mandatory ABC vaining to: 18 Board and Senior Committee Management 19 Internal audit function or other yes 19 Audit Line of Defence 19 Carry and Line of Defe	13	components of its AML, CTF & Sanctions	No
3. ANTI BRIBERY & CORRUPTION Has the Entity documented policies and procedures consistent with applicable ABC registrations and requirements to reasonably prevent, detect and report and the procedures? 16 Does the Entity's internal audit function or other independent third party cover ABC Policies and Procedures? 17 Does the Entity provide mandatory ABC training to: 18 Board and Senior Committee Management 19 To 1st Line of Defence 10 Yes 11 To 2 rad Line of Defence 11 To 2 rad Line of Defence 12 To 2 rad Line of Defence 13 To 3rd Line of Defence 14 San Line of Defence 15 To 2 rad Line of Defence 16 San Line of Defence 17 Can Line of Defence 17 Can Line of Defence 18 Not Applicable 19 Line of	13 а	If Y, provide further details	Not Applicable
3. ANTI BRIBERY & CORRUPTION Has the Entity documented policies and procedures consistent with applicable ABC registrations and requirements to reasonably prevent, detect and report and the procedures? 16 Does the Entity's internal audit function or other independent third party cover ABC Policies and Procedures? 17 Does the Entity provide mandatory ABC training to: 18 Board and Senior Committee Management 19 To 1st Line of Defence 10 Yes 11 To 2 rad Line of Defence 11 To 2 rad Line of Defence 12 To 2 rad Line of Defence 13 To 3rd Line of Defence 14 San Line of Defence 15 To 2 rad Line of Defence 16 San Line of Defence 17 Can Line of Defence 17 Can Line of Defence 18 Not Applicable 19 Line of	44	D # # # # # # # # # # # # # # # # # # #	
Has the Entity documented policies and procedures consistent with applicable ABC regulations and requirements to reasonably prevent, detect and report bribary and corruption? To Des the Entity internal audif function or other independent third party cover ABC Policies and Procedures? To Des the Entity internal audif function or other independent third party cover ABC Policies and Procedures? To Des the Entity provide mandatory ABC training to: To a Board and Senior Committee Management To a Jard Line of Defence Yes To 2nd Line of Defence Yes To 2nd Line of Defence Yes To 3nd Line of Defence Yes To 1 To 3nd Line of Defence Yes To 1 To 3nd Line of Defence Yes To 2nd Line of Defence Yes To 3nd Line of Defence Yes To 4 To 3nd Line of Defence Yes To 4 To			Yes
consistent with applicable ABC regulations and requirements to reasonably prevent, detect and requirements to reasonably prevent, detect and report bribery and comption? 16 Does the Entity provide mandatory ABC training to: 17 Does the Entity provide mandatory ABC training to: 17 a Board and Senior Committee Management 17 b 1st Line of Defence 17 c 2nd Line of Defence 17 d 3rd Line of Defence 17 d 3rd Line of Defence 17 d 3rd Line of Defence 17 e Third parties to which specific compliance activities subject to ABC risk have been outsourced 17 l 1 Non-employed workers as appropriate (contractors/consultants) 17 l Non-employed workers as appropriate (contractors/consultants) 18 Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: 18 A Money laundering 18 A Money laundering 19 Does the Entity have policies and procedures to sanctions violations 19 Does the Entity have policies and procedures to the prohibit december and accounts of unlineased banks and fortitions and fictitious named accounts 19 Prohibit depening and keeping of anonymous and fictitious named accounts for unlineased banks and for NBFIs 19 Prohibit dealing with other entities that provide banking services to unlicensed banks and for NBFIs 19 Prohibit dealing with other entities that provide banking services to unlicensed banks and for NBFIs 19 Prohibit dealing with nother Entity that provides services to shell banks of realionships with domestic and foreign PEPs, including their family and close associates 19 In Define the process for escalating financial crime risk issues/potentially suspicious activity identified by employees services as shell be process for escalating financial crime risk issues/potentially suspicious activity identified by employees services as shell process for escalating financial crime risk issues/potentially suspicious activity identified by employees.		RIBERY & CORRUPTION	
Independent third party cover ABC Policies and Procedures? 17 Des the Entity provide mandatory ABC training to: 17 a Board and Senior Committee Management 17 b 1st Line of Defence 17 c 2nd Line of Defence 17 d 3rd Line of Defence 17 e Third parties to which specific compliance activities subject to ABC risk have been outsourced 18 Non-employed workers as appropriate (contractors/consultants) 4. AML, CTF & SANCTIONS POLICIES & PROCEDURES 18 Hast he Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report. 18 Money laundering 18 Money laundering 19 Does the Entity have policies and procedures that: 19 Does the Entity have policies and procedures that: 19 Does the Entity have policies and procedures that: 19 Dribit the opening and keeping of anonymous and fictitious named accounts 19 Cribit the opening and keeping of accounts for unicensed banks and/or NBFIs 19 Cribit the opening and keeping of accounts for unicensed banks and/or NBFIs 19 Prohibit dealing with other entities that provide banking services to unicensed banks 19 Prohibit dealing with other entities that provide services to unicensed banks 19 Prohibit dealing with other entities that provide services to shell banks 19 Prohibit depling and keeping of accounts for Section 311 designated entities 19 Prohibit topening and keeping of accounts for Section 311 designated entities 19 Prohibit topening and keeping of accounts for Aves Services to shell banks 19 Prohibit opening and keeping of accounts for Aves Section 311 designated entities 19 Prohibit opening and keeping of accounts for Aves Section 311 designated entities 19 Prohibit opening and keeping of accounts for Aves Section 311 designated entities 19 Prohibit opening and keeping of accounts for Aves Section 311 designated entities 19 Prohibit opening and keeping of accounts for Aves Section 311 designated entities 19 Prohibit opening and keeping of accounts for Aves Section 311 designated entit		consistent with applicable ABC regulations and requirements to reasonably prevent, detect and	Yes
17 a Board and Senior Committee Management Yes 17 b 1st Line of Defence Yes 17 c 2nd Line of Defence Yes 17 d 3rd Line of Defence Yes 17 d 3rd Line of Defence Yes 17 e Third parties to which specific compliance activities subject to ABC risk have been outsourced Not applicable 17 f Non-employed workers as appropriate (contractors/consultants) 18 Non-employed workers as appropriate (contractors/consultants) 18 Las the Entity documented policies and procedures consistent with applicable ML. CTF & SanCtions regulations and requirements to reasonably prevent, detect and report: 18 a Money laundering Yes 18 b Terrorist financing Yes 18 c Sanctions violations Yes 19 Does the Entity have policies and procedures that: 19 a Prohibit the opening and keeping of accounts for unilicensed banks and/or NBFIs 19 c Prohibit dealing with other entities that provide banking services to unilicensed banks 19 d Prohibit dealing with other entities that provide banking services to shell banks 19 e Prohibit dealing with mother Entity that provides services to shell banks 19 e Prohibit dealing with another Entity that provides services to shell banks 19 f Prohibit dealing mand keeping of accounts for Section 311 designated entities 19 f Prohibit opening and keeping of accounts for Section 311 designated entities 19 g Prohibit dealing with mother entity that provides services to shell banks 19 e Prohibit dealing with mother Entity that provides services to shell banks 19 e Prohibit dealing with mother Entity that provides services to shell banks Yes 19 d Prohibit dealing with mother Entity that provides services to shell banks Yes 19 f Prohibit dealing with mother Entity that provides services to shell banks Yes 19 f Prohibit dealing with mother Entity that provides services to shell banks Yes 19 g Prohibit dealing with mother Entity that provides Section 311 designated entities 19 f Prohibit dealing with mother entities eagents, exchanges houses, casa de cambio, bureaux de change or money transfer agents 19 f Prohibit denoming and keep	16	independent third party cover ABC Policies and	Yes
17 b 1st Line of Defence Yes 17 c 2nd Line of Defence Yes 17 d 3rd Line of Defence Yes 17 e Third parties to which specific compliance activities subject to ABC risk have been outsourced subject to ABC risk have been outsourced (contractors/consultants) 4. AML, CTF & SANCTIONS POLICIES & PROCEDURES 18 Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: 18 a Money laundering Yes 18 b Terrorist financing Yes 18 c Sanctions violations Yes 19 Does the Entity have policies and procedures that: 19 a Prohibit the opening and keeping of anonymous and fictitious named accounts 19 b Prohibit dealing with other entities that provide banking services to unlicensed banks Yes 19 d Prohibit dealing with other entities that provide banking services to unlicensed banks Yes 19 d Prohibit dealing with another Entity that provides services to shell banks 19 f Prohibit dealing with another Entity that provides services to shell banks Yes 19 d Prohibit dealing with another Entity that provides services to shell banks Yes 19 f Prohibit dealing with another Entity that provides services to shell banks Yes 19 d Prohibit dealing with another Entity that provides services to shell banks Yes 19 f Prohibit opening and keeping of accounts for Section 311 designated entities change or money transfer agents 19 f Assess the risks of relationships with domestic and foreign PEPs, including their family and close associates 19 f Define the processes regarding screening for sanctions, PEPs and Adverse Media/Negative Yes	17		
17 c 2nd Line of Defence Yes 17 d 3rd Line of Defence Yes 17 d 3rd Line of Defence Yes 17 e Third parties to which specific compliance activities subject to ABC risk have been outsourced Not applicable 17 f Non-employed workers as appropriate (contractors/consultants) 18 Non-employed workers as appropriate Not applicable 18 Has the Entity documented policies and procedures consistent with applicable AML, CTF & SANCTIONS POLICIES & PROCEDURES 18 Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report. 18 a Money laundering Yes 18 b Terrorist financing Yes 19 Does the Entity have policies and procedures that: 19 a Prohibit the opening and keeping of anonymous and fictitious named accounts 19 Does the Entity have policies and procedures that: 19 a Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs 19 c Prohibit dealing with other entities that provide banking services to unlicensed banks and/or NBFIs 19 d Prohibit dealing with another Entity that provides services to shell banks 19 e Prohibit dealing with another Entity that provides services to shell banks 19 e Prohibit dealing with another Entity that provides services to shell banks 19 f Prohibit dealing with another Entity that provides services to shell banks 19 f Prohibit dealing with another Entity that provides services to shell banks 19 f Prohibit dealing with another Entity that provides services to shell banks 19 f Prohibit opening and keeping of accounts for section 3rd designated entities 19 g Prohibit opening and keeping of accounts for section 3rd designated entities 19 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 19 h Assess the risks of relationships with domestic and foreign PEPs, including their family and close associates 19 i Define the processes regarding screening for sanctions,	17 a	Board and Senior Committee Management	Yes
17 d 3rd Line of Defence 17 e Third parties to which specific compliance activities subject to ABC risk have been outsourced 17 f Non-employed workers as appropriate (contractors/consultants) 4. AML, CTF & SANCTIONS POLICIES & PROCEDURES 18 Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: 18 a Money laundering 18 b Terrorist financing 19 Does the Entity have policies and procedures that: 19 a Prohibit the opening and keeping of accounts for unilicensed banks and/or NBFIs 19 c Prohibit dealing with other entities that provide banking services to unilicensed banks 19 d Prohibit dealing with other entities that provides services to shell banks 19 f Prohibit dealing with another Entity that provides services to shell banks 19 f Prohibit dealing with another Entity that provides services to shell banks 19 f Prohibit topening and keeping of accounts for Section 311 designated entities express the risks of relationships with shell banks 19 f Prohibit topening and keeping of accounts for Section 311 designated entities express the risks of relationships with obsence agents exchanges houses, casa de cambio, bureaux de change or money transfer agents 19 f Assess the risks of relationships with domestic and foreign PEPs, including their family and close associates 19 f Define the processes regarding screening for sanctions, PEPs and Adverse Media/Negative 19 f Outline the processes regarding screening for sanctions, PEPs and Adverse Media/Negative	17 b	1st Line of Defence	Yes
17 e Third parties to which specific compliance activities subject to ABC risk have been outsourced 17 f Non-employed workers as appropriate (contractors/consultants) Not Applicable Not A	17 c	2nd Line of Defence	Yes
17 e Third parties to which specific compliance activities subject to ABC risk have been outsourced 17 f Non-employed workers as appropriate (contractors/consultants) 4. AML, CTF & SANCTIONS POLICIES & PROCEDURES 18 Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: 18 a Money laundering 18 b Terrorist financing 19 Cest the Entity have policies and procedures that: 19 a Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs 19 b Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs 19 c Prohibit accounts/relationships with shell banks 19 d Prohibit opening and keeping of accounts for Section 311 designated entities 19 f Prohibit opening and keeping of accounts for Section 311 designated entities 19 f Prohibit opening and keeping of accounts for Section 311 designated entities 19 f Prohibit opening and keeping of accounts for Section 311 designated entities 19 f Prohibit opening and keeping of accounts for Section 311 designated entities 19 g Prohibit opening and keeping of accounts for Section 311 designated entities 19 g Prohibit opening and keeping of accounts for Section 311 designated entities 19 g Prohibit opening and keeping of accounts for Section 311 designated entities 19 g Prohibit opening and keeping of accounts for Section 311 designated entities 19 g Prohibit opening and keeping of accounts for Section 311 designated entities 19 g Prohibit opening and keeping of accounts for Section 311 designated entities 19 g Prohibit opening and keeping of accounts for Section 311 designated entities 19 g Prohibit opening and keeping of accounts for Section 311 designated entities 19 g Prohibit opening and keeping of accounts for Section 311 designated entities 19 g Prohibit opening and keeping of accounts for Section 311 designated entities 19 g Prohibit opening and keeping of accounts for Section 311 designated entities	17 d	3rd Line of Defence	Yes
### AML, CTF & SANCTIONS POLICIES & PROCEDURES Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: 18 a	17 e	Third parties to which specific compliance activities	Not applicable
Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: 18 a Money laundering Yes 18 b Terrorist financing Yes 18 c Sanctions violations 19 Does the Entity have policies and procedures that: 19 a Prohibit the opening and keeping of anonymous and fictitious named accounts 19 b Prohibit the opening and keeping of accounts for unilicensed banks and/or NBFIs 19 c Prohibit dealing with other entities that provide banking services to unilicensed banks 19 d Prohibit dealing with other entities that provide banking services to unilicensed banks 19 d Prohibit dealing with another Entity that provides services to shell banks 19 f Prohibit dealing with another Entity that provides services to shell banks 19 f Prohibit opening and keeping of accounts for Section 311 designated entities 19 g Prohibit opening and keeping of accounts for Section 311 designated entities 19 g Prohibit opening and keeping of accounts for any of unilicensed/unregulated remittance agents, exchanges houses, casa de cambio, bureaux de change or money transfer agents 19 f Assess the risks of relationships with domestic and foreign PEPs, including their family and close associates 19 I Define the process for escalating financial crime risk issues/potentially suspicious activity identified by employees 19 J Outline the processes regarding screening for sanctions, PEPs and Adverse Media/Negative 19 J Outline the processes regarding screening for sanctions, PEPs and Adverse Media/Negative	17 f		Not Applicable
Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report: 18 a Money laundering Yes 18 b Terrorist financing Yes 18 c Sanctions violations 19 Does the Entity have policies and procedures that: 19 a Prohibit the opening and keeping of anonymous and fictitious named accounts 19 b Prohibit the opening and keeping of accounts for unilicensed banks and/or NBFIs 19 c Prohibit dealing with other entities that provide banking services to unilicensed banks 19 d Prohibit dealing with other entities that provide banking services to unilicensed banks 19 d Prohibit dealing with another Entity that provides services to shell banks 19 f Prohibit dealing with another Entity that provides services to shell banks 19 f Prohibit opening and keeping of accounts for Section 311 designated entities 19 g Prohibit opening and keeping of accounts for Section 311 designated entities 19 g Prohibit opening and keeping of accounts for any of unilicensed/unregulated remittance agents, exchanges houses, casa de cambio, bureaux de change or money transfer agents 19 f Assess the risks of relationships with domestic and foreign PEPs, including their family and close associates 19 I Define the process for escalating financial crime risk issues/potentially suspicious activity identified by employees 19 J Outline the processes regarding screening for sanctions, PEPs and Adverse Media/Negative 19 J Outline the processes regarding screening for sanctions, PEPs and Adverse Media/Negative	4. AML. C	TF & SANCTIONS POLICIES & PROCEDURES	
18 b Terrorist financing Yes 18 c Sanctions violations Yes 19 Does the Entity have policies and procedures that: 19 a Prohibit the opening and keeping of anonymous and fictitious named accounts 19 b Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs 19 c Prohibit dealing with other entities that provide banking services to unlicensed banks 19 d Prohibit dealing with another Entity that provides services to shell banks 19 e Prohibit opening and keeping of accounts for Section 311 designated entities 19 g Prohibit opening and keeping of accounts for Section 311 designated entities 19 g Prohibit opening and keeping of accounts for Section 311 designated remittance agents, exchanges houses, casa de cambio, bureaux de change or money transfer agents 19 h Assess the risks of relationships with domestic and foreign PEPs, including their family and close associates 19 j Define the process for escalating financial crime risk issues/potentially suspicious activity identified by employees 19 j Outline the processes regarding screening for sanctions, PEPs and Adverse Media/Negative Yes	18	consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent,	
18 c Sanctions violations Yes 19 Does the Entity have policies and procedures that: 19 a Prohibit the opening and keeping of anonymous and fictitious named accounts 19 b Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs 19 c Prohibit dealing with other entities that provide banking services to unlicensed banks 19 d Prohibit decining with other entities that provide banking services to unlicensed banks 19 e Prohibit dealing with another Entity that provides services to shell banks 19 e Prohibit opening and keeping of accounts for Section 311 designated entities 19 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 19 h Assess the risks of relationships with domestic and foreign PEPs, including their family and close associates 19 i Define the process for escalating financial crime risk issues/potentially suspicious activity identified by employees 19 j Outline the processes regarding screening for sanctions, PEPs and Adverse Media/Negative Yes	18 a	Money laundering	Yes
19 Does the Entity have policies and procedures that: 19 a Prohibit the opening and keeping of anonymous and fictitious named accounts 19 b Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs 19 c Prohibit dealing with other entities that provide banking services to unlicensed banks 19 d Prohibit accounts/relationships with shell banks 19 e Prohibit dealing with another Entity that provides services to shell banks 19 f Prohibit opening and keeping of accounts for Section 311 designated entities 19 g Prohibit opening and keeping of accounts for socion 311 designated entities 19 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 19 h Assess the risks of relationships with domestic and foreign PEPs, including their family and close associates 19 i Define the process for escalating financial crime risk issues/potentially suspicious activity identified by employees 19 j Outline the processes regarding screening for sanctions, PEPs and Adverse Media/Negative Yes	18 b	Terrorist financing	Yes
Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit dealing with another Entity that provides services to shell banks Prohibit dealing with another Entity that provides services to shell banks Prohibit opening and keeping of accounts for Section 311 designated entities Prohibit opening and keeping of accounts for Section 311 designated entities 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 Assess the risks of relationships with domestic and foreign PEPs, including their family and close associates Perohibit opening and keeping of accounts for any of unlicensed/unregulated remittance agents, exchanges houses, casa de cambio, bureaux de change or money transfer agents 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 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 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 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 Prohibit opening and keeping of accounts for any of unlicensed/unregulated remittance agents, exchanges houses, casa de cambio, bureaux de change of accounts for any of unlicensed/unregulated remittance agents, exchanges houses, casa de cambio, bureaux de change of accounts for any of unlicensed/unregulated remittance agents, exchanges houses, cas	18 c	Sanctions violations	Yes
Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit dealing with another Entity that provides services to shell banks Prohibit dealing with another Entity that provides services to shell banks Prohibit opening and keeping of accounts for Section 311 designated entities 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 Assess the risks of relationships with domestic and foreign PEPs, including their family and close associates Pefine the process for escalating financial crime risk issues/potentially suspicious activity identified by employees Outline the processes regarding screening for sanctions, PEPs and Adverse Media/Negative Yes	19	Does the Entity have policies and procedures that:	
Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit accounts/relationships with shell banks Prohibit dealing with another Entity that provides services to shell banks Prohibit opening and keeping of accounts for Section 311 designated entities Prohibit opening and keeping of accounts for accounts for section 311 designated entities 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 Passess the risks of relationships with domestic and foreign PEPs, including their family and close associates Pess 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 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 Prohibit opening and keeping of accounts for associates 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 Prohibit dealing with another Entity that provides Pros Prohibit dealing with another Entity that provides Pres Prohibit dealing with an	19 a	Prohibit the opening and keeping of anonymous	Yes
banking services to unlicensed banks 19 d	19 b	Prohibit the opening and keeping of accounts for	Yes
19 d Prohibit accounts/relationships with shell banks Yes 19 e Prohibit dealing with another Entity that provides services to shell banks 19 f Prohibit opening and keeping of accounts for Section 311 designated entities 19 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 19 h Assess the risks of relationships with domestic and foreign PEPs, including their family and close associates 19 i Define the process for escalating financial crime risk issues/potentially suspicious activity identified by employees 19 j Outline the processes regarding screening for sanctions, PEPs and Adverse Media/Negative Yes Yes	19 с	Prohibit dealing with other entities that provide	Yes
Prohibit dealing with another Entity that provides services to shell banks 19 f Prohibit opening and keeping of accounts for Section 311 designated entities 19 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 19 h Assess the risks of relationships with domestic and foreign PEPs, including their family and close associates 19 i Define the process for escalating financial crime risk issues/potentially suspicious activity identified by employees 19 j Outline the processes regarding screening for sanctions, PEPs and Adverse Media/Negative Yes Yes	19 d	<u> </u>	Yes
19 f Prohibit opening and keeping of accounts for Section 311 designated entities 19 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 19 h Assess the risks of relationships with domestic and foreign PEPs, including their family and close associates 19 i Define the process for escalating financial crime risk issues/potentially suspicious activity identified by employees 19 j Outline the processes regarding screening for sanctions, PEPs and Adverse Media/Negative Yes		Prohibit dealing with another Entity that provides	
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 19 h Assess the risks of relationships with domestic and foreign PEPs, including their family and close associates 19 i Define the process for escalating financial crime risk issues/potentially suspicious activity identified by employees 19 j Outline the processes regarding screening for sanctions, PEPs and Adverse Media/Negative Yes	19 f	Prohibit opening and keeping of accounts for	Yes
foreign PEPs, including their family and close associates 19 i Define the process for escalating financial crime risk issues/potentially suspicious activity identified by employees 19 j Outline the processes regarding screening for sanctions, PEPs and Adverse Media/Negative Yes Yes	19 g	Prohibit opening and keeping of accounts for any of unlicensed/unregulated remittance agents, exchanges houses, casa de cambio, bureaux de	Yes
risk issues/potentially suspicious activity identified by employees 19 j Outline the processes regarding screening for sanctions, PEPs and Adverse Media/Negative Yes	19 h	foreign PEPs, including their family and close	Yes
sanctions, PEPs and Adverse Media/Negative Yes		risk issues/potentially suspicious activity identified	Yes
	19 j	sanctions, PEPs and Adverse Media/Negative	Yes

20	Has the Entity defined a risk tolerance statement or similar document which defines a risk boundary around their business?	Yes
21	Does the Entity have record retention procedures that comply with applicable laws?	Yes
21 a	If Y, what is the retention period?	
		5 years or more
5. KYC. C	DD and EDD	
22	Does the Entity verify the identity of the customer?	Yes
23	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
24	Which of the following does the Entity gather and retain when conducting CDD? Select all that apply:	
24 a	Customer identification	Yes
24 b	Expected activity	Yes
24 c	Nature of business/employment	Yes
24 d	Ownership structure	Yes
24 e	Product usage	Yes
24 f	Purpose and nature of relationship	Yes
24 g	Source of funds	Yes
24 h 25	Source of wealth	Yes
25 25 a	Are each of the following identified:	Voe
25 a 25 a1	Ultimate beneficial ownership Are ultimate beneficial owners verified?	Yes Yes
25 b	Are ultimate penelicial owners verified? Authorised signatories (where applicable)	Yes
25 c	Key controllers	Yes
25 d	Other relevant parties	Yes
26	Does the due diligence process result in customers receiving a risk classification?	Yes
27	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
28	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
29	Is KYC renewed at defined frequencies based on risk rating (Periodic Reviews)?	Yes
29 a	If yes, select all that apply:	
29 a1	Less than one year	Yes
29 a2	1 – 2 years	Yes
29 a3	3 – 4 years	Yes
29 a4	5 years or more	Yes
29 a5 29 a6	Trigger-based or perpetual monitoring reviews Other (please specify)	Yes
30	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?	
30 a	Arms, Defence, Military	EDD on risk-based approach
30 b	Respondent Banks	EDD on risk-based approach
30 b1	If EDD or EDD & restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022?	Yes
30 с	Embassies/Consulates	EDD on risk-based approach
30 d	Extractive industries	EDD on risk-based approach
30 e	Gambling customers	Prohibited
30 f	General Trading Companies	EDD on risk-based approach
30 g	Marijuana-related Entities	Prohibited
30 h	MSB/MVTS customers	EDD on risk-based approach
30 i	Non-account customers	Prohibited
30 j	Non-Government Organisations	EDD on risk-based approach
30 k		
	Non-resident customers	EDD on risk-based approach

30 I	Nuclear power	EDD on risk-based approach
30 m	Payment Service Providers	EDD on risk-based approach
30 n	PEPs	EDD on risk-based approach
30 o	PEP Close Associates	EDD on risk-based approach
30 p	PEP Related	EDD on risk-based approach
30 q	Precious metals and stones	EDD on risk-based approach
30 r	Red light businesses/Adult entertainment	Prohibited
30 s	-	
30 t	Regulated charities	EDD on risk-based approach
	Shell banks	Prohibited
30 u	Travel and Tour Companies	EDD on risk-based approach
30 v	Unregulated charities	Prohibited
30 w	Used Car Dealers	EDD on risk-based approach
30 x	Virtual Asset Service Providers	Prohibited
30 y	Other (specify)	
31	If restricted, provide details of the restriction	
6 MONITO	I DRING & REPORTING	
32		
	Does the Entity have risk based policies, procedures and monitoring processes for the identification and reporting of suspicious activity?	Yes
33	What is the method used by the Entity to monitor transactions for suspicious activities?	Combination of automated and manual
33 a	If manual or combination selected, specify what type of transactions are monitored manually	System based alerts and notification reviews are enabled; in addition to manual based testing of transactions to ensure high value, high risk client and unusual transactions are monitored and for ensuring effectiveness of system controls
34	Does the Entity have regulat ory requirements to report suspicious transactions?	Yes
34 a	If Y, does the Entity have policies, procedures and processes to comply with suspicious transactions reporting requirements?	Yes
35	Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity?	Yes
7. PAYMEN	T TRANSPARENCY	
36	Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards?	Yes
37	Does the Entity have policies, procedures and processes to comply with and have controls in place to ensure compliance with:	
37 a	FATF Recommendation 16	Yes
37 b	Local Regulations	Yes
37 b1	If Y, Specify the regulation	Kuwait AML Law, Regulations issued by the Capital Markets Authority, Kuwait and Central Bank of Kuwait
37 с	If N, explain	
8. SANCTI	ONS	
38	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
39	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

40	Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists?	Yes
41	Select the Sanctions Lists used by the Entity in its sanctions screening processes:	
41 a	Consolidated United Nations Security Council Sanctions List (UN)	Used for screening customers and beneficial owners and for filtering transact
41 b	United States Department of the Treasury's Office of Foreign Assets Control (OFAC)	Used for screening customers and beneficial owners and for filtering transact
41 c	Office of Financial Sanctions Implementation HMT (OFSI)	Used for screening customers and beneficial owners and for filtering transact
41 d	European Union Consolidated List (EU)	Used for screening customers and beneficial owners and for filtering transact
41 e	Lists maintained by other G7 member countries	Used for screening customers and beneficial owners and for filtering transact
41 f	Other (specify)	Local Blacklist issued by the Ministry of Foreign Affairs through the Capital Markets Authority, Kuwait
42	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
9. TRAININ	IG & EDUCATION	
43	Does the Entity provide mandatory training, which includes:	
43 a	Identification and reporting of transactions to government authorities	Yes
43 b	Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered	Yes
43 c	Internal policies for controlling money laundering, terrorist financing and sanctions violations	Yes
43 d	New issues that occur in the market, e.g. significant regulatory actions or new regulations	Yes
44	Is the above mandatory training provided to :	
44 a	Board and Senior Committee Management	Yes
44 b	1st Line of Defence	Yes
44 c	2nd Line of Defence	Yes
44 d	3rd Line of Defence	Yes
44 e	Third parties to which specific FCC activities have been outsourced	Not Applicable
44 f	Non-employed workers (contractors/consultants)	Not Applicable
10. AUDIT		
45	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
Signature Par Wolfsberg Gro	ge pup Financial Crime Compliance Questionnaire 2023 (FCCQ \	V1.2)
Kuwait Finand	cial Centre K.P.S.C.	(Financial Institution name)
-		
Anu Abraha	(Senior Com	pliance Manager- Second Line representative), certify that I have read and
I, understood thi	(Senior Com	e and correct to my honest belief. DS MARKAZ