

## Anti-Money Laundering & Combating Financing of Terrorism Statement

### Domicile

Seera Investment Bank B.S.C.(c) is an Islamic Wholesale Investment Bank licensed by the Central Bank of Bahrain. Established in August 2006 as a Bahraini Joint Stock Closed Company, Seera is located in the Seef District, Kingdom of Bahrain.

### Ownership

The shareholders of the Bank are HNWI's and Institutions mainly from the GCC countries. Seera has a broad shareholder base with no single shareholder holding over 10% shareholding with the exception of National Investments Company, a Kuwait based Company listed on Kuwait Stock Exchange, which holds 34.33% of the share capital.

### Laws And Supervision

Seera is under the supervision of the Central Bank of Bahrain (CBB) and complies with the Amiri Decree law no. (4) of 2001 (and its amendments Decree Law no. (51) of 2006) with respect to the Prevention & Prohibition of the Laundering of Money (the "AML Law") and the CBB AML/CFT Regulations. CBB has adopted and is compliant with the forty recommendations plus nine special recommendations issued by the Financial Action Task Force (FATF) which are the international standards for effective anti-money laundering regimes and combating the financing of terrorism.

### Seera's Policies

- Seera recognizes money laundering and terrorist financing as a significant risk to the financial sector & has taken measures to ensure that the bank does not provide financial services to listed terrorists and/or sanctioned names notified by competent authorities.
- The Bank's AML/CFT program is based on the CBB's AML/CFT Regulation and includes the anti-money laundering and combating the financing of terrorism policies & procedures which is implemented with the intention of deterring criminals from using the services for laundering the proceeds of crime or financing terrorism.
- Seera's Compliance Department and MLRO will ensure adherence to the anti-money laundering and combating the financing of terrorism policies & procedures laid down by the Bank's Board of Directors. Furthermore the implementation of such AML/CFT policies & procedures would be subject to independent internal & external audits and are inspected by the Central Bank of Bahrain.
- As a policy Seera does not conduct business with Shell Banks or other entities with no physical presence.

- The Bank does not operate anonymous accounts.
- Seera has effective procedures for verifying client identification, source of funds and for the retention of the relevant customer due diligence information.
- The Bank has established a system to detect transactions involving clients who are on the UN and OFAC lists and other similar key lists or any names advised by CBB.
- As a matter of policy the Bank will not transact or conduct business with correspondent banks which are domiciled in jurisdictions classified as non-cooperative countries or territories by FATF.
- As a policy, the Bank will ensure that all relevant employees are familiar with Seera's AML/CFT policies & procedures and attend relevant AML/CFT training programmes followed by refresher courses, as necessary.
- The Bank is required by law to file a report in case of any suspicious activity. This report is to be submitted to the CBB/Compliance Directorate & Ministry of Interior/Enforcement Unit.
- Seera's customers/investors would include banks, financial institutions, corporates and high-net worth individuals mainly located in the GCC & MENA countries as well as selectively in Europe & North America.

**Shahzad Iqbal**

Chief Operating Officer & MLRO

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