

Anti-Money Laundering Program Certification

In response to best practices recommendations and the Wolfsberg Anti-Money Laundering (AML) principles for correspondent banking, Bank of Jordan Group, together with all its branches and subsidiaries, hereby declare their compliance with AML/CTF regulations.

Moreover, and as a Jordanian entity, Bank of Jordan is subject to all Anti-Money Laundering and Counter Terrorist Financing Instructions issued by the Central Bank of Jordan, and derived from the Anti-Money Laundering and Counter Terrorism Financing Law No. (46) For the year 2007. This imposes the establishment of an independent program aimed to combat money laundering and the financing of terrorism by banks and financial institutions.

The scope of AML program

The Anti-Money Laundering and Countering Financing of Terrorism is the Master Policy for the AML / CFT issues to all members of Bank of Jordan Group including foreign branches and subsidiaries and represents the headlines should comply with, taking into consideration the laws and regulations of the host country of which the foreign branch or affiliates are located within their jurisdiction. In case of inconsistency (or contradiction), any of the provisions of this policy with the laws and instructions of the host country of the foreign branch or subsidiary, the more restricted instructions shall be observed.

This policy includes but is not limited to the following: -

- KYC and KYE Policy – Customer/ employee acceptance.
- Risk based customer classification.
- Customer identification and Analysis.
- Continuous monitoring of accounts and their operational transactions (all accounts, especially high-risk accounts).

Customer Due Diligence (CDD)

Customer due diligence means the identification of the customer's identity, legal status, nature of business, purpose of the business relationship and the ultimate beneficiary (if any), and the verification of all neutral and reliable sources plus the continuous monitoring of transactions conducted in a continuous relationship by any means specified by relevant legislation, as well as Identification of the nature and purpose of the future relationship between the bank and the customer.

Enhance Due Diligence (EDD)

The bank should take enhanced due diligence measures when the customer's risk rating in money laundering and terrorist financing is high as follows:

- Obtain the approval of the general manager / regional director or the representative from the executive management before establishing or continuing the relationship with these customers, such approval must also be obtained upon discovering that the risks of one of the customers or the ultimate beneficial owners (UBO) have become within this category.
- Take sufficient actions to fulfill the source of the wealth of customers and real ultimate beneficial owners (UBO) who have been classified in this category.
- Monitor (Follow up) the transactions of these customers with the bank accurately and continuously as well as conduct enhanced due diligence to the work relations and operations with any of them, while continuing to take strict care and control of those relations.
- Taking the necessary measures to determine the background of the circumstances surrounding any of the business relations and transactions with any of the customers classified in this category and its purposes in case the bank finds that none of them are based on clear economic justification, and to decide on them while keeping the results in their records.

International Financial and Economic Sanctions Program

- Bank of Jordan improve a database that include financial and economic sanctions imposed by (Office of Foreign Assets Control, United Nations, and the European Union) to summarize every sanctions and licenses related to it through a hyperlink that enable us to see all the details related to it and save any updates.
- We determined all business lines that may touch that sanctions as we delivered all the requirements needed to be comply with the sanction program.
- The sanctions screening is a monitoring tool used by the bank to detect, limit and manage the risks of sanctions and should be considered as part of an effective financial crimes compliance program to help identify individuals and entities subject to any sanctions as well as the illegal activity that may be exposed to the bank in light of the continued expansion and increasing complexity of regulations International sanctions.

Training

- Prepare and implement a continuous training program all employees of different managerial levels on Money Laundering (ML) and Terrorism Financing (TF) and ways to combat those crimes.
- Hold specialized training workshops that match employee levels in accordance with the nature of their respective work.
- Keep abreast of training courses and local and international publications on the subject to stay up to date with all developments and adjust the training courses accordingly.
- E-learning Program: Retain records for all training programs held over a period of no less than five years. Such records shall maintain the names of trainers and their qualifications in addition to the party that held the training, whether inside or outside the country.

Audit

- Anticipate audit functions by internal audits to ensure that all employees and officers in charge are aware of ML/TF and the trends of suspicious transactions each according to their own capacity.

Record Keeping

- All records and documents supporting ongoing relations and banking transactions shall be retained for a minimum period of five years as of the date of transaction execution or termination of the relationship.

For more clarification, kindly find the attached Wolfsberg AML Certification. For additional information, please contact our Compliance Department Manager, Ms. Lana Al-Barishi, via email at LBarishi@bankofjordan.com.jo.

Foreign Account Tax Compliance Act (FATCA)

Bank of Jordan Group is compliant with FATCA and entered into an FFI Agreement, as shown in the table below:-

Financial Institution Name	Status	Country/Jurisdiction of FFI or Branch	GIIN
Bank of Jordan PLC	PFFI	Jordan	VTB927.00000.LE.400
Bank of Jordan PLC	PFFI	West Bank and Gaza	VTB927.00001.ME.275
Excel for Financial Investment	PFFI	Jordan	VTB927.00002.ME.400
Bank of Jordan PLC - Branch	PFFI	Bahrain	VTB927.00000.BR.048