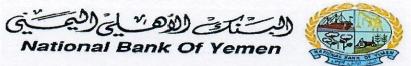


## NATIONAL BANK OF YEMEN <u>AML / CFT / KYC QUESTIONNAIRE FOR FINANCIAL INSTITUTIONS</u>

In order to comply with the regulator Central Bank of Yemen and as a part of global compliance with Anti Money Laundering and Countering Financing of Terrorism policies and procedures all financial institutions are required to complete this questionnaire which to be completed and dully signed by an authorized person.

	SECTION (1) - GENERAL INFORMATION		
1	Name of Institution	National Bank of Yemen	
2	Legal Status	Financial Institution	
3	Banking License No.	A02/0101/2863	
4	Country of Incorporation	Republic of Yemen – Aden Governorate	
5	Registration Number	1748	
6	Date of Registration	31.December.2024	
7	Address of Head Office	P. O. Box: 5, Crater, Aden - Republic Of Yemen	
8	Website Address	www.nbyemen.com	
9	Major Business Activities	Commercial	
10	Compliance Officer Contact:		
	Name:	Faisal Mohsen Mohsen Al-Soudi	
	Position:	Head of Compliance Unit	
	Telephone:	+967 02 265077	
	Fax:	+967 02 395162	
	E-mail Address:	ml-unit@nbyemen.com	
11	Name of the Financial Banking Regulatory in your country	Central Bank of Yemen - Aden	
12	Name of the Regulatory Authority for AML and suspicious	FIU - Aden	



		Company and the company of the compa
13	Name of Branches:  Domestic:  Foreign (if any):	Available on the website  N/A  All bank branches domiciled within Yemen only and have no presence outside Republic of Yemen.
14	Please provide most recent annual report	Available on the website
15	Please Provide a list of major shareholders holding more than 10% shares in your institutions	The bank is a State Owned Entity under the supervision of the minister of finance and has no shareholders.
16	Current list of Members of the Board of Directors	Available on the website
17	Current List Board of Directors	Available on the website
18	Current List of Top Level Management	Available on the website
19	Number of Employees	950
20	Purpose of the business relationship	Trade Finance
21	How many customers does your institution have?	120, 274
	SECTION (2) - C	LIENT BASE
22	Does your institution provide financial services to any of the following customer:  MSB / MVTs customers  Cash Intensive Business  Casinos  Non – account customers  Unregulated Charities  Nuclear Power  Payment Service Providers  Red Lights Business  Arms , Defense , Military  Marijuana – related entities	No N



	SECTION (3) - RISK ASSESSMENT			
	A DO TAOTA (C) TROPE AND PROPERTY.			
23	Does the financial Institution have a risk assessment methodology to assess the AML by its customers and their transactions?	Yes		
24	What factors are used by the financial institution to determine risk classification?	The bank recently implemented in corporation with Bio Tech Solutions – The Hasemite Kingdom of Jordan a RBA system in order to classify clients by a risk ranking (High, Medium, Low) which collects customers data to detect potential risk whether they are individuals or entities.		
	SECTION (4) - AML / CFT AND PROCEDURES			
25	Is the AML / CFT Compliance program approved by the Financial institutions Board or Committee?	Yes		
26	Has your country establish laws to prevent AML and CFT?	Yes		
27	Are your laws consistent with FATF Recommendations?	Yes		
28	Has your financial institution developed written policies and implemented internal procedures and controls to prevent, detect and report suspicious transactions?	Yes		
29	Does your financial institution have an internal audit function that assesses AML / CFT policies and practices on a regular basis?	Yes		
30	Does your policy prohibiting accounts / relationships with shell banks?	Yes		
31	Does your financial institution have policies ensure that they will not conduct transactions with or behalf of shell banks through any of its accounts or products?	Yes		





32	Does your financial institution have policies ensure that they will not conduct transactions with or behalf of shell banks through any of its accounts or products?		
33	Does your financial institution maintain payable through accounts?	No	
34	Does your financial institution maintain nested accounts?	No	
	SECTION (5) - KYC, CDD AND EDD		
35	Has the financial institution implemented a systems for the identification of its customers, including customer information in the case of recorded transactions account opening for example name, nationality, street address, telephone number, occupation, age / date of birth, number and type of valid official identification and the home of the country / state that is issued it?	Yes	
36	Does the financial institution have a CDD and EDD program to identify and verify identity?	Yes	
37	Who is responsible for KYC during on boarding and review?	Branches customer services officers	
38	Is the KYC process centralized or conduct by branches? If conducted by branches, is there centralized review or approval?	It is implemented through branches and reviewed by the liaison officers at branches and opening account is approved by the branch managers. All bank's branches also conduct and follow enhanced due diligence procedures for customers flagged as high risk based on risk-scoring methods and one of the procedures includes requires senior management approval for establishing or continuing the business relationship.	
39	Does the financial institution monitor clients for sanctions entities and countries before entering in business relationship?	Yes Yes	





40	Does the financial institution have a process to review and update customer information relating to high risk client information, adverse information screening and SAR?	Yes	
41	Does the financial institution have RBA to screening customer to determine whether they are PEPs or controlled by PEPs?	Yes	
42	Does the financial institution have policies, procedures and process to review from screening customers to determine whether they are PEPs or controlled by PEPs?	Yes	
43	Does the financial institution identify the UBOs of its customers?	Yes	
44	Does the financial institution review and update customer information based on KYC renewal, trigger event?	Yes	
45	Does the financial institution have a policy of protecting employees who report in good faith any suspicious transactions / activities?	Yes	
	SECTION (6) - SCREENING AND	SANCTIONS COMPLIANCE	
46	Does the financial screen its customer database against proscribed lists? if yes, please name lists the financial institution uses?	Yes	
47	Does the financial institution have sanctions policy approved by management?	Yes	
	SECTION (7) - TRANSACTIONS MONITORING REPORT		
48	Does the financial institution have policies for the ID and reporting transactions that are required to report to authorities?	Yes	
49	Does the financial institution have a monitoring process to detect suspicious transactions? If yes, is this process to manual or automated, if	Yes BANK OF	



	automated please provide vendor?	
50	Does the financial institution pay attention to high risk customers?	Yes
51	Does your financial institution report any suspicious transactions in the past year?	Yes
	SECTION (8) - Al	ML TRAINING
52	Does the financial institution provide AML Training to relevant employees?	Yes
53	<ul> <li>Does AML Training includes:</li> <li>Identification and reporting transactions that must be reported to government authorities.</li> <li>Examples of different forms of ML involving the financial institutions product and services.</li> <li>Internal policies to prevent ML.</li> </ul>	Yes Yes Yes
54	Does the financial institution retain records of its training sessions including attendance records and relevant training material used?	Yes
55	Does the financial institution communicate new AML related laws or changes to existing AML related policies or practices to relevant employees?	Yes
56	Does the financial institution employ third parties to carry out some of the functions of the financial institutions? If yes, Does AML training includes some material provided to relevant employees?	Yes

I hereby confirm that to the best of my knowledge the statements given above are true and correct as well as I confirm that I am authorized to complete this document.

Name: Faisal Mohsen Mohsen Al-Soudi

Title: Head of Compliance Unit

Signature:

Date: 21. November .2024