

# BURGAN BANK: Anti-Financial Crimes Questionnaire



## Section 1: Entity Information

Name of FI/Entity	Burgan Bank (K.P.S.C)	
Registered Office Address	Burgan Bank Head Office- Abdullah Al Ahmed Street- PO Box 5389 Safat 12170 Kuwait	
Website Address	www.burgan.com	
Country of incorporation	State of Kuwait	
SWIFT BIC Code	BRGNKWKW	
Commercial Registration Number	24067	
Commercial Registration Issuance & Expiration Date	Issuance Date	Expiration Date
	November 1, 2022	November 1, 2026
License Number	37/1985	
Is your Institution/ Entity (or parent company) publicly traded?	Yes; Traded in: Kuwait Stock Exchange- Boursa - Trade name: BURG	
Total number of domestic and international branches and subsidiaries	Domestic branches: 29 Retail Branches International subsidiaries: 3	
Officer who is responsible for the FI's Anti-Money Laundering (MLRO) Program	MLRO Name	Hamad Abdulhadi Mohammad
	Title	Deputy General Manager- Anti Financial Crimes Group
	Email Address	hamadam@burgan.com
Main Contact for the FI	Name	Aliah Ahmed Dehdary
	Title	Manager, Correspondent Banking
	Email Address	adehdary@burgan.com
Please indicate the primary business activities of the institution	<ul style="list-style-type: none"> <li>- Consumer Banking</li> <li>- Corporate Banking</li> </ul>	
Total number of employees within the Compliance/ Anti-Financial Crimes Department	14	
Is your FI registered under FATCA?	Yes; GIIN (Global Intermediary Identification Number): 9MM959.00000.LE.414	

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<b>Section 2: Management &amp; Shareholder Information</b>	
Please contact the Burgan Bank Group Anti-Financial Crimes Department (AML@burgan.com) for further information pertaining the Ultimate Beneficial Owner(s), Board of Directors, and Senior Management	
<b>Section 3: Legislation &amp; Training</b>	
Has your country of registration / incorporation established laws and regulations to Combat Money Laundering and Terrorism Financing?	Yes
Relevant Laws and Regulations: <ul style="list-style-type: none"> <li>- Kuwait Law concerning Combating Money Laundering and Terrorism Financing, Law No. 106/2013</li> <li>- CBK Circular concerning Instructions on AML / CTF (2/RB/RBA/507/2023) issued on February 21, 2023</li> <li>- CBK Circular concerning Correspondences with Kuwait's Financial Intelligence Unit No. (8519/105/2) issued on August 14, 2019</li> <li>- Ministerial Resolution issued by the Committee for the Implementation of Security Council Resolutions under Chapter VII of the United Nations Charter formed at the Kuwait's Ministry of Foreign Affairs No. 35 issued on August 28th, 2019</li> <li>- Ministerial Resolution concerning the issuance of Law 106/2013 regarding AML/CTF Executive Statues No. 37 issued in 2013</li> <li>- CBK Circular concerning the Mechanism of following up with the decisions issued by the Committee for the Implementation of Security Council Resolutions under Chapter VII of the United Nations Charter formed at the Kuwait's Ministry of Foreign Affairs No. (2/105/11105/2019) issued on October 28, 2019</li> </ul>	
Is your country member of Financial Action Task Force (FATF) or regional FATF style bodies?	Yes
Name of your Financial Intelligence Unit (FIU)	Kuwait Financial Intelligence Unit "KFIU"
Does your country legislation require you to comply with customer due diligence measures when:	
a) Establishing a business relationship?	Yes
b) Carrying out transactions with significant value and/or information? (e.g. transactions above KWD 3,000 or equivalent in other currency)	Yes
Does your country legislation require you to include following in the customer due diligence processes:	
a) Identifying the customer and verifying the customer's identity on the basis of documents, data or information obtained from a reliable and independent source?	Yes

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b) Identifying the beneficial owner and verifying his/her government issued identity papers?	Yes
c) Obtaining information on the purpose and intended nature of the business relationship?	Yes
d) Conducting ongoing monitoring of the business relationship?	Yes
Does your country legislation prohibit you from keeping anonymous / numbered accounts or accounts in fictitious names?	Yes
Does your country legislation require you to have enhanced due diligence measures for transactions or business relationships with "Politically Exposed Persons (PEP)"?	Yes
Primary Regulators Information	Name of Primary Regulator: Central Bank of Kuwait ("CBK")
Does your institution have an employee-training program to train employees about Anti-Financial Crimes that includes	
a) Identification and reporting of transactions that must be reported to government authorities.	Yes
b) Identifying/reporting suspicious activities	Yes
c) Examples of different forms of Money Laundering involving the FI's products and services.	Yes
d) Internal policies to prevent Money Laundering, combating Terrorism Financing and Sanctions Compliance.	Yes
e) Awareness of various applicable Sanctions programs and review of account activity / transactions to identify and deter threat of Sanctions' violation.	Yes
Does your institution retain records of its training sessions including attendance records and relevant training materials used?	Yes
Does your institution communicate new AML related laws, or changes to existing AML related policies or practices to relevant employees?	Yes
Does your institution employ third parties to carry out some of the AML functions and processes of the FI?	No

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Section 4: AFC Policies and Procedures	
Is the AML compliance program approved by your Institution's Board or a Senior Committee?	Yes; Burgan Bank Board of Directors
Does the FI review these Policies & Procedures on periodic basis?	Yes; Annually (by maximum of 2 years)
Has your FI implemented written Policies & Procedures on KYC?	Yes
Has your FI developed written Policies documenting the processes that they have in place to prevent, detect and report suspicious transactions approved by senior management?	Yes
Does your FI have a Policy prohibiting accounts/relationships with Shell Banks?	Yes
Does your FI have Policies to reasonably ensure that they will not conduct transactions with or on behalf of Shell Banks through any of its accounts or products?	Yes
Does your FI have Policies covering relationships with Politically Exposed Persons (PEP's), their family and close associates?	Yes
Does your FI have a Record Retention Procedure?	Yes; 5 Years
Does your FI require the Identification and Verification of Beneficial Owners?	Yes; <ul style="list-style-type: none"> <li>▪ Percentage of ownership (Direct/Indirect): 25%</li> <li>▪ Percentage of ownership (Direct/Indirect) for Shareholding Companies: 25%</li> </ul>
Please describe your FI's controls and measures when dealing with high-risk customers.	Burgan Bank conducts a risk-based approach where we evaluate the customer type, geography, products and services, industry, and distribution channels. The result of such are categorized as Prohibited, High, Medium, or Low. Customers with High Risk Rating, an Enhanced Due Diligence measures are implemented on them where we scrutinize their transactions and profile in terms of documentation.

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Please describe your FI's controls and measures when dealing with PEPs		<p>If the Bank determines that a Customer or a Beneficial Owner as a PEP, it shall apply Enhanced Due Diligence ("EDD") measures for both Foreign and Domestic PEPs:</p> <ul style="list-style-type: none"> <li>- Obtain Executive or Senior Management approval;</li> <li>- Obtain Source of wealth and source of funds;</li> <li>- Conducting enhanced ongoing monitoring.</li> </ul>
<b>Section 5: Screening Measures</b>		
Sanctions Screening	Lists Screened	<ul style="list-style-type: none"> <li>- OFAC</li> <li>- United Nations</li> <li>- European Union</li> <li>- Kuwait Ministry of Foreign Affairs</li> <li>- UK HMT</li> </ul>
	Level of Automation	Automated
	Timing of Customer-Base Screening against Sanction Lists	<ul style="list-style-type: none"> <li>- When Sanctions Lists Change</li> <li>- During ad-hoc review of Customer information</li> <li>- During on-boarding</li> <li>- During Customer Periodic Review</li> </ul>
	Transaction Screening	<ul style="list-style-type: none"> <li>- Local Remittances</li> <li>- Cross-Border Remittances</li> <li>- Trade Finance related transactions</li> </ul>
Does your FI process transactions on behalf of sanctioned countries, entities, or individuals?		No
Has the FI implemented controls to identify customers that are targeted by sanctions at onboarding and during the customer life cycle (post onboarding)? Please provide a summary of the controls		Burgan Bank has zero tolerance towards any sanctioned Individual, Country, and Entities. Clients and transactions screening are performed on a daily basis through our automated system against applicable sanctions lists
Monitoring & Name Screening	Pre-fact Transactions Monitoring	Automated
	Post-Fact Transaction Monitoring	Automated
	Name Screening	Automated

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<b>Section 6: Risk Assessment</b>	
Does your FI complies with FATF’s Risk Based Approach factors in determining the customer risk sensitivity level?	Yes; Factors: Customer Type (Including Industry Type), Geographical locations, and Distribution Channels
Does your FI classify customers into various risk sensitivity level?	Yes; High, Medium, or Low
Please indicate the period of recertification of each risk sensitivity level	High Risk Customers: Annually or less Medium Risk Customers: Every 2 Years or less Low Risk Customers: Maximum every 3 Years
May the risk classification be reviewed in case of trigger events (such as negative news)?	Yes



Hamad Abdulhadi Mohammad

Deputy General Manager- Anti Financial Crimes Group