

Samba Financial Group Anti-Money Laundering Declaration

1. Name: Samba Financial Group
2. Address of Head Office: P.O. Box 833, Riyadh 11421, Saudi Arabia
3. Website: www.samba.com
4. Core Business: Banking including but not limited to: Retail, Corporate, Private, Treasury
5. Name of Regulatory Body: Saudi Arabian Monetary Agency (SAMA)
6. Name of Stock Exchange: Tadawul (Saudi Arabian Stock Exchange)

1.	Is the Country in which Samba Financial Group is located a member of the Financial Action Task Force (FATF)? Kingdom of Saudi Arabia is a member of MENAFATF.
2.	Has the country in which Samba Financial Group is located established Laws/Regulations concerning AML/CFT/KYC? Yes.
3.	Is Money Laundering considered, by laws and regulations, as a crime? Yes.
4.	Does the country's regulatory body (Central Bank) require all financial institutions to have Anti Money Laundering (AML) and Know Your Customers (KYC) procedures? Yes.
5.	Is Samba Financial Group subject to such Laws/Regulations? Yes. If so, is Samba Financial Group in compliance with AML and KYC rules? Yes.
6.	Is Samba Financial Group required by any local or international law(s) to establish an AML&CTF program? If so, please identify the applicable laws and/or regulations: SAMA's Rules Governing Anti-Money Laundering & Combating Terrorist Financing (AML & CTF) are based on Saudi Arabian Law of Combating Money Laundering issued in 2003. The Rules are in accordance with FATF 40 Recommendations, the 9 Special Recommendations on Terrorist Financing, UN Security Council Resolutions as well as regional and international conventions in this regard.
7.	Has Samba Financial Group developed written Anti-Money Laundering (AML), Combating Terrorist Financing (CTF) and Know Your Customers (KYC) policies and procedures, which have been approved by the Management Committee of the Bank? Yes.
8.	Has the Board been informed that these policies were approved, are in force and are consistent with SAMA requirements? Yes.
9.	Is Samba Financial Group fully compliant with the country's regulatory body (Central Bank/SAMA) and the FATF 49 recommendations? Yes.
10.	Has Samba Financial Group signed the USA Patriot Act Certification? Yes.

11	<p>Does Samba Financial Group have an established Audit and Compliance function to monitor and review the effectiveness of AML policies and procedures? Yes. Samba Financial Group has an established independent Internal Audit function that reports directly to the Board Audit Committee. Additionally, Samba Financial Group has a separate Compliance function reporting to the Chief of Staff (Board Member) to monitor and review the effectiveness of AML/KYC/CTF policies and procedures.</p>
12	<p>Does Internal Audit of Samba Financial Group review the AML process regularly? Yes.</p>
13	<p>Does Samba Financial Group have a compliance officer appointed to oversee anti-money laundering arrangements? Yes.</p>
14	<p>Has Samba Financial Group adopted a Know Your Customers (KYC) or Customer Identification Policy that applies to its customer relationships? Yes.</p>
15	<p>Does Samba Financial Group review those policies and procedures when necessary? Yes.</p>
16	<p>Do you apply the AML and CTF policies of the head office to all overseas branches and majority owned subsidiaries? Yes. All overseas Branches and majority owned subs are required to comply with the full AML/CTF/KYC requirements of the country in which they operate.</p>
17	<p>Does Samba Financial Group have policies covering relationships with politically exposed persons consistent with industry best practices? Yes.</p>
18	<p>Is Samba Financial Group able to confirm that it does not maintain relationships with 'shell banks' (defined as a bank without a physical presence and not affiliated to a regulated bank that does not maintain a physical presence)? Yes.</p>
19	<p>Does Samba Financial Group open anonymous or numbered accounts? No.</p>
20	<p>In relation to cross-border correspondent banking and other similar relationships, does Samba Financial Group gather sufficient information about respondent institution to understand their business, reputation, quality of supervision and regulatory history? Yes.</p>
21	<p>Does Samba Financial Group allow direct use of correspondent account by third parties (payable through accounts) to transact business on their own behalf? No.</p>
22	<p>Does Samba Financial Group have a risk focused assessment of its customer base and transactions of its customers? Yes.</p>
23	<p>Does Samba Financial Group determine the appropriate level of enhanced due diligence necessary for those categories of customers and transactions that the financial institution has reason to believe pose a heightened risk of illicit activities at or through the financial institution? Yes.</p>
24	<p>Has Samba Financial Group implemented systems for the identification of its Customers (using independent verifiable sources) including: a) Identification of beneficial ownership (including ownership and control structure where applicable)? Yes. b) Information regarding the purposes and the nature of business relationship?</p>

	<p>Yes.</p> <p>c) On-going due diligence of the business relationship and scrutiny of transactions undertaken to ensure consistency with customer profile?</p> <p>Yes.</p> <p>d) Procedures that establish a record for each customer, noting their respective identification documents at account opening (for example: name, nationality, street address, telephone number, occupation, age/date of birth, number and type of valid official identification, as well as the name of the country/state that issued it)?</p> <p>Yes.</p>
25	<p>Does Samba Financial Group have a requirement to collect information regarding its customers' business activities?</p> <p>Yes.</p>
26	<p>How long does Samba Financial Group keep records of customer and account beneficiaries' identification, transaction history?</p> <p>Yes. Records are retained for a minimum period of 10 years, while customer originated media are retained permanently.</p>
27	<p>Does Samba Financial Group take steps to understand the normal and expected transactions of its customers based on its risk assessment of its customers?</p> <p>Yes.</p>
28	<p>Does Samba Financial Group have policies or practices for the identification and reporting of transactions that are required to be reported to the authorities?</p> <p>Yes.</p>
29	<p>Does Samba Financial Group have an automated system to monitor suspicious activity?</p> <p>Yes.</p>
30	<p>Does Samba Financial Group have policies or practices to identify transactions structured to avoid large cash reporting requirement?</p> <p>Yes.</p>
31	<p>Does Samba Financial Group have a policy that specifies how transactions involving occasional Customers should be handled?</p> <p>Yes.</p>
32	<p>Does Samba Financial Group require complete information for outgoing wire transfer instructions, including sender and beneficiary names, addresses, account numbers and purpose?</p> <p>Yes.</p>
33	<p>Does Samba Financial Group have a screening process to search the customer database against government published lists of prohibited parties?</p> <p>Yes.</p>
34	<p>Is training provided to all Samba Financial Group's staff handling customer accounts and related functions?</p> <p>Yes.</p>
35	<p>Does Samba Financial Group maintain records of executed training including attendance records and training materials used?</p> <p>Yes.</p>
36	<p>Does Samba Financial Group communicate new AML/CTF laws or regulations or changes to existing laws or regulations to relevant employees?</p> <p>Yes.</p>
37	<p>Has Samba Financial Group been subject to sanctions or punitive actions – related to anti-money laundering or terrorist financing – by the regulator or law enforcement agencies in the past five years?</p> <p>No.</p>
38	<p>Names of major share holders for Samba Financial Group. The updated list of major share holders who owns more than 5% of Samba Financial Group shares is available in the Tadawul website:</p>

	http://www.tadawul.com.sa
39	Sources of further general information: Please refer to Bank's website: www.samba.com