

**the  
Wolfsberg  
Group**

|                             |                                  |
|-----------------------------|----------------------------------|
| Financial Institution Name: | National Bank of Kuwait S.A.K.P. |
| Location (Country) :        | Kuwait                           |

| No #                             | Question  | Answer  |
|----------------------------------|---|---|
| <b>1. ENTITY &amp; OWNERSHIP</b> |   |   |
| 1                                | Full Legal name   | National Bank of Kuwait S.A.K.P   |
| 2                                | Append a list of foreign branches which are covered by this questionnaire (if applicable)         | Please refer to our website: www.nbk.com  |
| 3                                | Full Legal (Registered) Address   | NBK New Headquarters Building - Al Shuhadaa St. - Sharq - P.O.Box 95, 13001 Safat - Kuwait.<br>Telephone no.: +965 2259 3011<br>Telephone no.: +965 2246 7926       |
| 4                                | Full Primary Business Address (if different from above)   | N/A   |
| 5                                | Date of Entity incorporation / establishment  | 19/5/1952   |
| 6                                | Select type of ownership and append an ownership chart if available                               |   |
| 6 a                              | Publicly Traded (25% of shares publicly traded)   | Yes   |
| 6 a1                             | If Y, indicate the exchange traded on and ticker symbol   | Boursa Kuwait<br>Ticker symbol: NBK<br>NBK is 100% publicly listed and there is no individual share holding exceeding 10% of the issued shares capital of the bank. |
| 6 b                              | Member Owned / Mutual   | No  |
| 6 c                              | Government or State Owned by 25% or more  | No  |
| 6 d                              | Privately Owned   |   |
| 6 d1                             | If Y, provide details of shareholders or ultimate beneficial owners with a holding of 10% or more |   |
| 7                                | % of the Entity's total shares composed of bearer shares  | N/A   |
| 8                                | Does the Entity, or any of its branches, operate under an Offshore Banking License (OBL) ?        | No  |
| 8 a                              | If Y, provide the name of the relevant branch/es which operate under an OBL                       | N/A   |

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| <b>2. AML, CTF &amp; SANCTIONS PROGRAMME</b> |  |     |
|--|--|-----|
| <b>9</b>                                     | Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:        |     |
| <b>9 a</b>                                   | Appointed Officer with sufficient experience / expertise   | Yes |
| <b>9 b</b>                                   | Cash Reporting   | No  |
| <b>9 c</b>                                   | CDD  | Yes |
| <b>9 d</b>                                   | EDD  | Yes |
| <b>9 e</b>                                   | Beneficial Ownership   | Yes |
| <b>9 f</b>                                   | Independent Testing  | Yes |
| <b>9 g</b>                                   | Periodic Review  | Yes |
| <b>9 h</b>                                   | Policies and Procedures  | Yes |
| <b>9 i</b>                                   | Risk Assessment  | Yes |
| <b>9 j</b>                                   | Sanctions  | Yes |
| <b>9 k</b>                                   | PEP Screening  | Yes |
| <b>9 l</b>                                   | Adverse Information Screening  | Yes |
| <b>9 m</b>                                   | Suspicious Activity Reporting  | Yes |
| <b>9 n</b>                                   | Training and Education   | Yes |
| <b>9 o</b>                                   | Transaction Monitoring   | Yes |
| <b>10</b>                                    | Is the Entity's AML, CTF & Sanctions policy approved at least annually by the Board or equivalent Senior Management Committee? | Yes |
| <b>11</b>                                    | Does the Entity use third parties to carry out any components of its AML, CTF & Sanctions programme?                           | No  |
| <b>11a</b>                                   | If Y, provide further details  |     |

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| 3. ANTI BRIBERY & CORRUPTION |  |     |
|------------------------------|--|-----|
| 12                           | Has the Entity documented policies and procedures consistent with applicable ABC regulations and requirements to [reasonably] prevent, detect and report bribery and corruption? | Yes |
| 13                           | Does the Entity's internal audit function or other independent third party cover ABC Policies and Procedures?  | Yes |
| 14                           | Does the Entity provide mandatory ABC training to:   |     |
| 14 a                         | Board and Senior Committee Management  | Yes |
| 14 b                         | 1st Line of Defence  | Yes |
| 14 c                         | 2nd Line of Defence  | Yes |
| 14 d                         | 3rd Line of Defence  | Yes |
| 14 e                         | 3rd parties to which specific compliance activities subject to ABC risk have been outsourced   | No  |
| 14 f                         | Non-employed workers as appropriate (contractors / consultants)  | No  |

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| 4. AML, CTF & SANCTIONS POLICIES & PROCEDURES |  |                 |
|---|--|-----------------|
| <b>15</b>                                     | Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report:     |                 |
| <b>15 a</b>                                   | Money laundering   | Yes             |
| <b>15 b</b>                                   | Terrorist financing  | Yes             |
| <b>15 c</b>                                   | Sanctions violations   | Yes             |
| <b>16</b>                                     | Does the Entity have policies and procedures that:   |                 |
| <b>16 a</b>                                   | Prohibit the opening and keeping of anonymous and fictitious named accounts  | Yes             |
| <b>16 b</b>                                   | Prohibit the opening and keeping of accounts for unlicensed banks and / or NBFIs   | Yes             |
| <b>16 c</b>                                   | Prohibit dealing with other entities that provide banking services to unlicensed banks   | Yes             |
| <b>16 d</b>                                   | Prohibit accounts / relationships with shell banks   | Yes             |
| <b>16 e</b>                                   | Prohibit dealing with another Entity that provides services to shell banks   | Yes             |
| <b>16 f</b>                                   | Prohibit opening and keeping of accounts for Section 311 designated entities   | Yes             |
| <b>16 g</b>                                   | Prohibit opening and keeping of accounts for any of unlicensed / unregulated remittance agents, exchanges houses, casa de cambio, bureaux de change or money transfer agents | Yes             |
| <b>16 h</b>                                   | Assess the risks of relationships with domestic and foreign PEPs, including their family and close associates  | Yes             |
| <b>16 i</b>                                   | Define escalation processes for financial crime risk issues  | Yes             |
| <b>16 j</b>                                   | Specify how potentially suspicious activity identified by employees is to be escalated and investigated  | Yes             |
| <b>16 k</b>                                   | Outline the processes regarding screening for sanctions, PEPs and negative media   | Yes             |
| <b>17</b>                                     | Has the Entity defined a risk tolerance statement or similar document which defines a risk boundary around their business?   | Yes             |
| <b>18</b>                                     | Does the Entity have a record retention procedures that comply with applicable laws?   | Yes             |
| <b>18 a</b>                                   | If Y, what is the retention period?  | 5 years or more |

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| 5. KYC, CDD and EDD |  |     |
|---------------------|--|-----|
| 19                  | Does the Entity verify the identity of the customer?   | Yes |
| 20                  | Do the Entity's policies and procedures set out when CDD must be completed, e.g. at the time of onboarding or within 30 days   | Yes |
| 21                  | Which of the following does the Entity gather and retain when conducting CDD? Select all that apply:   |     |
| 21 a                | Ownership structure  | Yes |
| 21 b                | Customer identification  | Yes |
| 21 c                | Expected activity  | Yes |
| 21 d                | Nature of business / employment  | Yes |
| 21 e                | Product usage  | Yes |
| 21 f                | Purpose and nature of relationship   | Yes |
| 21 g                | Source of funds  | Yes |
| 21 h                | Source of wealth   | Yes |
| 22                  | Are each of the following identified:  |     |
| 22 a                | Ultimate beneficial ownership  | Yes |
| 22 a1               | Are ultimate beneficial owners verified?   | Yes |
| 22 b                | Authorised signatories (where applicable)  | Yes |
| 22 c                | Key controllers  | Yes |
| 22 d                | Other relevant parties   |     |
| 23                  | Does the due diligence process result in customers receiving a risk classification?  | Yes |
| 24                  | Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?   | Yes |
| 25                  | Does the Entity have policies, procedures and processes to review and escalate potential matches from screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs? | Yes |
| 26                  | Does the Entity have a process to review and update customer information based on:   |     |
| 26 a                | KYC renewal  | Yes |
| 26 b                | Trigger event  | Yes |

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|              |   |   |
|--------------|---|---|
| <b>27</b>    | From the list below, which categories of customers or industries are subject to EDD and / or are restricted, or prohibited by the Entity's FCC programme? |   |
| <b>27 a</b>  | Non-account customers   | Prohibited                                |
| <b>27 b</b>  | Non-resident customers  | EDD on a risk based approach              |
| <b>27 c</b>  | Shell banks   | Prohibited                                |
| <b>27 d</b>  | MVTS/ MSB customers   | EDD on a risk based approach              |
| <b>27 e</b>  | PEPs  | EDD on a risk based approach              |
| <b>27 f</b>  | PEP Related   | EDD on a risk based approach              |
| <b>27 g</b>  | PEP Close Associate   | EDD on a risk based approach              |
| <b>27 h</b>  | Correspondent Banks   | EDD on a risk based approach              |
| <b>27 h1</b> | If EDD or EDD & restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2014?               | Yes                                       |
| <b>27 i</b>  | Arms, defense, military   | Prohibited                                |
| <b>27 j</b>  | Atomic power  | Prohibited                                |
| <b>27 k</b>  | Extractive industries   | EDD on a risk based approach              |
| <b>27 l</b>  | Precious metals and stones  | EDD on a risk based approach              |
| <b>27 m</b>  | Unregulated charities   | Prohibited                                |
| <b>27 n</b>  | Regulated charities   | EDD & restricted on a risk based approach |
| <b>27 o</b>  | Red light business / Adult entertainment  | Prohibited                                |
| <b>27 p</b>  | Non-Government Organisations  | EDD on a risk based approach              |
| <b>27 q</b>  | Virtual currencies  | Prohibited                                |
| <b>27 r</b>  | Marijuana   | Prohibited                                |
| <b>27 s</b>  | Embassies / Consulates  | EDD on a risk based approach              |
| <b>27 t</b>  | Gambling  | Prohibited                                |
| <b>27 u</b>  | Payment Service Provider  | Prohibited                                |
| <b>27 v</b>  | Other (specify)   |   |
| <b>28</b>    | If restricted, provide details of the restriction   |   |

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| 6. MONITORING & REPORTING |   |                                     |
|---------------------------|---|-------------------------------------|
| 29                        | Does the Entity have risk based policies, procedures and monitoring processes for the identification and reporting of suspicious activity?                | Yes                                 |
| 30                        | What is the method used by the Entity to monitor transactions for suspicious activities?  | Combination of automated and manual |
| 31                        | Does the Entity have regulatory requirements to report suspicious transactions?   | No                                  |
| 31 a                      | If Y, does the Entity have policies, procedures and processes to comply with suspicious transactions reporting requirements?                              |                                     |
| 32                        | Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity? | Yes                                 |

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| 7. PAYMENT TRANSPARENCY |   |   |
|-------------------------|---|---|
| 33                      | Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards?   | Yes   |
| 34                      | Does the Entity have policies, procedures and processes to [reasonably] comply with and have controls in place to ensure compliance with: |   |
| 34 a                    | FATF Recommendation 16  | Yes   |
| 34 b                    | Local Regulations   | Yes   |
| 34 b1                   | Specify the regulation  | Refer to Central Bank of Kuwait website: <a href="http://www.cbk.gov.kw">www.cbk.gov.kw</a> |
| 34 c                    | If N, explain   |   |



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| 8. SANCTIONS |  |   |
|--------------|--|---|
| 35           | Does the Entity have policies, procedures or other controls reasonably designed to prohibit and / or detect actions taken to evade applicable sanctions prohibitions, such as stripping, or the resubmission and / or masking, of sanctions relevant information in cross border transactions? | Yes   |
| 36           | Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists?  | Yes   |
| 37           | Select the Sanctions Lists used by the Entity in its sanctions screening processes:  |   |
| 37 a         | Consolidated United Nations Security Council Sanctions List (UN)   | Used for screening customers and beneficial owners and for filtering transactional data |
| 37 b         | United States Department of the Treasury's Office of Foreign Assets Control (OFAC)   | Used for screening customers and beneficial owners and for filtering transactional data |
| 37 c         | Office of Financial Sanctions Implementation HMT (OFSI)  | Used for screening customers and beneficial owners and for filtering transactional data |
| 37 d         | European Union Consolidated List (EU)  | Used for screening customers and beneficial owners and for filtering transactional data |
| 37 e         | Lists maintained by other G7 member countries  | Not used  |
| 37 f         | Other (specify)  | MAS, CSSF, Local lists issued by the local regulatory authority, ... etc.               |
| 38           | Does the Entity have a physical presence, e.g., branches, subsidiaries, or representative offices located in countries / regions against which UN, OFAC, OFSI, EU and G7 member countries have enacted comprehensive jurisdiction-based Sanctions?   | No  |

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| 9. TRAINING & EDUCATION |   |     |
|-------------------------|---|-----|
| <b>39</b>               | Does the Entity provide mandatory training, which includes :  |     |
| <b>39 a</b>             | Identification and reporting of transactions to government authorities  | Yes |
| <b>39 b</b>             | Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered | Yes |
| <b>39 c</b>             | Internal policies for controlling money laundering, terrorist financing and sanctions violations  | Yes |
| <b>39 d</b>             | New issues that occur in the market, e.g., significant regulatory actions or new regulations  | Yes |
| <b>40</b>               | Is the above mandatory training provided to :   |     |
| <b>40 a</b>             | Board and Senior Committee Management   | Yes |
| <b>40 b</b>             | 1st Line of Defence   | Yes |
| <b>40 c</b>             | 2nd Line of Defence   | Yes |
| <b>40 d</b>             | 3rd Line of Defence   | Yes |
| <b>40 e</b>             | 3rd parties to which specific FCC activities have been outsourced   | No  |
| <b>40 f</b>             | Non-employed workers (contractors / consultants)  | No  |

**10. AUDIT**

|    |   |     |
|----|---|-----|
| 41 | In addition to inspections by the government supervisors / regulators, does the Entity have an internal audit function, a testing function or other independent third party, or both, that assesses FCC AML, CTF and Sanctions policies and practices on a regular basis? | Yes |
|----|---|-----|