

HBTF Sanctions Policy Statement

The Housing bank for Trade and Finance is committed to comply with sanctions laws and regulations issued by the international bodies such as; the United Nations, the United States, the European Union, the United Kingdom (HMT) and the applicable local sanctions laws and regulations.

HBTF has developed Sanctions Policy, procedures, controls and standards in order to comply with the above obligations. This includes the following:

- Screening customers/clients names before and during banking relationships, HBTF's transactions and operations including wire transfers (both inward and outward payments) and all trade finance transactions against international sanctions lists issued by the United Nations (UN), the United States (OFAC), the European Union (EU), the United Kingdom (HMT) and the Internal HBTF list.
- Prohibiting business activities, banking transactions, customer relationships and other transactions that deemed to be named/listed by UN, EU, OFAC, HMT or the local regulatory sanctions lists, and/or related directly or in-directly to sanctioned parties or territories groups.
- Prohibiting any trade finance transactions that involve individuals, entities or vessels listed any international sanctions lists issued by the UN, EU, OFAC, HMT or the local regulatory sanctions list whether directly or indirectly.
- Reviewing/ investigating all customers transactions that are stopped by the filtering sanctions system, in order to comply with sanctions laws and regulations issued by the international bodies.
- Blocking or rejecting transactions where HBTF is obligated to do so under the applicable sanctions laws or regulations.
- HBTF may decide not to process transactions, provide products or services even where permitted by applicable sanctions laws and regulations where these activities fall outside of HBTF's risk appetite.
- HBTF is committed to educate all bank's staff with necessary information about sanctions issues such as ; sanctions violations, sanctions circumvention, sanctions laws and regulations, through training courses and awareness publications provided to employees, about policies, procedures and internal controls implemented by HBTF in avoiding sanctions violations.

HBTF believes that the adoption of such Sanctions policy is an essential part of its compliance function. Accordingly, this policy have been developed to reflect HBTF's commitments to the regulatory obligations.

Nayef Al-Hussein

EVP-Head of Compliance

