

The Housing Bank for Trade and Finance Sanctions Compliance Policy Statement

The Housing Bank for Trade and Finance (HBTF) is fully committed to sanctions laws and regulations issued by relevant international and local authorities, including the United Nations (UN), the United States (OFAC), the European Union (EU), the United Kingdom (HMT), as well as applicable Jordanian sanctions laws and regulations.

To ensure adherence to these obligations, HBTF has established a comprehensive sanctions compliance framework comprising policies, procedures and controls designed to mitigate sanctions-related risks. **This framework includes the following key measures:**

- Conducting customer screening prior to onboarding and on an ongoing basis throughout the business relationship, in addition to screening all transactions, including inward and outward wire transfers and trade finance activities, against sanctions lists issued by the UN, OFAC, EU, HMT, National Jordanian list, as well as HBTF's internal watchlists.
- Prohibiting the establishment or continuation of relationships and transactions involving parties designated under sanctions regimes, whether directly or indirectly.
- Preventing trade finance activities that involve sanctioned parties or sanctioned countries in accordance with applicable sanctions lists and regulatory requirements.
- Investigating and reviewing all alerts generated by the sanctions screening systems to ensure appropriate escalation and compliance with applicable laws and regulations.
- Blocking, rejecting, or freezing transactions as required by applicable sanctions laws or regulatory obligations.
- Providing continuous training and awareness programs to enhance understanding of sanctions risks, including sanctions evasion, violations, and internal control requirements.
- HBTF reserves the right to decline or discontinue transactions, products or services that may not directly violate sanctions laws but fall outside the Bank's defined risk appetite.
- HBTF recognizes the importance of combating Proliferation Financing (PF) and is committed to complying with applicable international obligations, sanctions requirements, and regulatory requirements related to the prevention of financing the proliferation of weapons of mass destruction. HBTF applies screening measures through automated systems to identify and prevent activities associated with proliferation financing risks, including dual-use goods, related materials and technologies, as well as transactions involving high-risk jurisdictions.

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

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