

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 and the applicable local sanctions laws and regulations, and the related Sanctions regulations in foreign countries where the Bank's branches are located.

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

- Screening customers/clients names before and during banking relationships, and 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) as well as HBTF Internal black list.
- Prohibiting business activities, banking transactions, customer relationships and other transactions that deemed to be 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 may involve individuals, entities or vessels listed by 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 system, and taking the appropriate decision regarding those transactions either to clear the transactions or Blocking / rejecting them based on 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 a solid Sanction compliance frame work is an essential part of its compliance function & ongoing operations. Accordingly, this policy statement have been developed to reflect HBTF's commitments to the regulatory obligations.

Nayef Al- Hussein

Executive Manager- Compliance Department

