



AML/CFT Policy Statement

Name: Invest Bank P.S.C.

Central Bank of the UAE License No.: 13/208/96

Commercial Registration No.: 61581

Place of Registration: Sharjah, U.A.E

Invest Bank PSC (Bank) was established in 1975 in the Emirate of Sharjah and is a public shareholding company. The Bank shares are listed on the Abu Dhabi Securities Exchange. It operates under the license from the Central Bank of the United Arab Emirates (UAE). The Central Bank of the UAE (CBUAE) is the regulatory and supervisory authority for banks and financial institutions in the country.

UAE Central Bank has issued several regulations to combat the Money Laundering and Financing Terrorism activities such as the updated guidelines of 3599/2023 on Anti-Money Laundering and Combating the Financing of Terrorism and Illegal Organizations Guidelines for Financial Institutions & 4368/2021 for Guidance for Licensed Institutions on Transaction Monitoring and Sanctions Screening. On the national level, the Federal Government of the UAE has issued the Federal Decree Law No. (20) of 2018 on Anti Money Laundering and Combating the Financing of Terrorism and Financing of Illegal Organizations. To ensure a proper Implementation of the said Federal Decree Law, the Government has issued the Cabinet Decision No. (10) of 2019 Concerning the Implementing Regulation of Decree Law No. (20) of 2018 on Anti Money Laundering and Combating the Financing of Terrorism and Illegal Organizations.

The aim of these laws and guidelines is to combat the Money Laundering and Financing Terrorism and establish a legal framework that supports and strengthens the efforts of the relevant authorities in the nation in countering Money Laundering and related financial crimes. The law also counters financing of terrorist operations and suspicious organizations, which enhances the UAE commitment to international recommendations and treaties.

UAE is a member of GCC (Gulf Cooperation Council) that is in turn a member of the Middle East North Africa Financial Action Task Force (MENAFATF).

Guided by these rules and regulations, as well as FATF recommendations, Wolfsberg group principles and Basel Committee on Banking Supervision's guidelines on Customer Due Diligence, the Bank has reviewed, updated, developed and implemented AML, CFT, CPF and Sanctions policies and procedures including but not limited to:

MLRO

The Bank has appointed a Money Laundering Reporting Officer (MLRO) in accordance with the CBUAE requirements and the same is approved by the regulators.



Risk based customer due diligence

Invest Bank has adopted a risk-based approach for managing and monitoring ML /TF risks. This takes into consideration the nature of the Bank's business, jurisdictions and activities. During the onboarding stage, the customers will be subject to due diligence depending on the risks associated to their business activities, products & services, geographical location and delivery channels. Accordingly, customers will be classified as Low, Medium or High.

Existing customers are subject to periodic and ongoing due diligence updates depending on their risk classification.

Identification of customers and ultimate beneficial owners

In line with UAE regulations and best practices, the natural person who owns 25% or more or exercises effective ultimate control, directly or indirectly, over a customer (Natural Person or Legal Person or Legal arrangement) or the natural person on whose behalf a transaction is being conducted must be identified. However, for additional scrutiny, the Bank is identifying 10% or more of the ownership for high-risk accounts. This ratio may be reduced in case of any doubt or suspicion while assessing the relationship.

Guidelines concerning PEP

PEPs are classified as High Risk. All High-Risk accounts are subject to senior management approval, and they are subject to EDD on onboarding and ongoing stages.

Prohibition in dealing with shell banks and shell companies

As part of the Bank's customer acceptance policy and local regulations, the Bank does not establish or continue business relationships with banks or companies with no physical presence or "mind and management" in the jurisdiction in which they are licensed, and which is unaffiliated with a regulated financial or company group subject to effective consolidated supervision (Shell banks and companies).

Sanctions procedures including screening of relevant lists

All new and existing customers are automatically screened daily to ensure that the customers are not locally or internationally sanctioned. Lists include World-Check Data and local list provided by CBUAE. Furthermore, wire transfers are subject to an automated pre-fact screening against those lists.

Monitoring and Suspicious Transactions Reporting

In conducting transactions, the Bank makes all reasonable efforts to ascertain and verify the identity of the parties and genuineness of the financial transaction. Suspicious transactions/activities will be reported internally to MLRO, whereas filing an STR/SAR with FIU, lies independently with MLRO.

Countering Proliferation Financing

The bank takes appropriate steps to manage and mitigate PF risks that is identified in the institutional risk assessment. AML/CFT policies and procedures which cover PF and reflect CPF guidance and warnings issued by the EOCN, supervisory authorities, the FATF, and other relevant international best practices.



Record Keeping and Retention

Invest Bank maintains all necessary records on transactions, both domestic and international, for a period of 5 years following the completion of the transaction. This is regardless of whether the account or business relationship is ongoing or has been terminated. In case the customer account is closed or terminated, documents and records relating to identification, risk profiling and transactions carried out by such customers shall be retained for the period of 5 years from the date of closure of account.

Policies related to continuous training of staff on AML

All employees attend adequate and appropriate AML / CFT trainings. Role-specific training on AML/CFT is provided in line with regulatory expectations for employees who have additional training needs due to the nature of their roles and responsibilities. The training program includes examples of different forms of Money Laundering & Financing Terrorism involving the Customer's products and services, recognition of the suspicious transaction and procedure for reporting the same and demonstrate internal policies to prevent Money Laundering and Financing Terrorism. All new joiners undergo relevant Compliance AML / CFT training as part of the induction program.

Independent Compliance Quality Assurance testing

An independent Compliance Quality Assurance testing of key Financial Crime Compliance processes and controls is conducted on a periodic basis by the Internal Audit Department.

FATCA and CRS Reporting

The Bank is committed to comply with FATCA and CRS Regulations and to cooperate fully with the local authorities and regulators to detect and combat financial crimes such as tax evasion.

Additional information & documentation are also available on Bankers Almanac repository and SWIFT KYC Registry.

Further Compliance inquiries should be addressed to:

Wisam Simrin

Acting Head of Compliance

Email: wissam.simrin@investbank.ae

Tel: +971 6 5980677