the Wolfsberg Group

Financial Institution Name: Arab Bank – Syria Location (Country) : Damascus, Syria

The questionnaire is required to be answered on a Legal Entity (LE) Level. The Financial Institution should answer the questionnaire at the legal entity level including any branches for which the client base, products and control model are materially similar to the LE Head Office. This questionnaire should not cover more than one LE. Each question in the CBDDQ will need to be addressed from the perspective of the LE and on behalf of all of its branches. If a response for the LE differs for one of its branches, this needs to be highlighted and details regarding this difference captured at the end of each sub-section. If a branch's business activity (products offered, client base etc.) is materially different than its Entity Head Office, a separate questionnaire can be completed for that branch.

No#	Question	Answer
1. ENTITY	& OWNERSHIP	
1	Full Legal Name	Bank - Syria
2	Append a list of foreign branches which are covered by this questionnaire	Not applicable
3	Full Legal (Registered) Address	Al Mahdi Bin Barakeh Street, Abu Rummaneh, Damascus, Syria
4	Full Primary Business Address (if different from above)	Al Mahdi Bin Barakeh Street, Abu Rummaneh, Damascus, Syria
5	Date of Entity incorporation/establishment	March.24th, 2005
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	Damascus Securities Exchange. Ticker symbol is (ARBS).
6 b	Member Owned/Mutual	No 🔽
6 C	Government or State Owned by 25% or more	No
6 d	Privately Owned	No
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	0%
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	Not applicable
9	Does the Bank have a Virtual Bank License or provide services only through online channels?	No
10	Name of primary financial regulator/supervisory authority	Central Bank Of Syria, Combating Money Laundering & Terrorism Financing Commission
11	Provide Legal Entity Identifier (LEI) if available	Not available
12	Provide the full legal name of the ultimate parent (if different from the Entity completing the DDQ)	Arab Bank PLC

	Jurisdiction of licensing authority and regulator of ultimate parent Select the business areas applicable to the Entity Retail Banking	Jordan
14 14 14 14 14 14 14 14 14 14 14 14 14 1	Select the business areas applicable to the Entity Retail Banking	
4 a 4 b 4 c 4 d 4 e 4 f 4 g	Retail Banking	
4 a 4 b 4 c 4 d 4 e 4 f 4 g	Retail Banking	
4 a 4 b 4 c 4 d 4 e 4 f 4 g	Retail Banking	
4 b 4 c 4 d 4 e 4 f 4 g		Yes
4 c 4 d 4 e 4 f 4 g	Private Banking	Yes Contraction Co
4 d 4 e 4 f 4 g	Commercial Banking	Yes
4 e 4 f 4 g	-	
4 f 4 g	Transactional Banking	No
4 g	Investment Banking	No Image: Constraint of the second seco
	Financial Markets Trading	No
4 h	Securities Services/Custody	No
	Broker/Dealer	No
4 i	Multilateral Development Bank	No
4 j	Wealth Management	No
4 k	Other (please explain)	
	Does the Entity have a significant (10% or more) portfolio of non-resident customers or does it derive	
	more than 10% of its revenue from non-resident customers? (Non-resident means customers primarily resident in a different jurisdiction to the location where bank services are provided)	No
15 a	If Y, provide the top five countries where the non- resident customers are located.	
16	Select the closest value:	
6 a	Number of employees	201-500
6 b	Total Assets	Between \$100 and \$500 million
	Confirm that all responses provided in the above	
	Section are representative of all the LE's branches.	Yes
17 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
	If appropriate, provide any additional information/context to the answers in this section.	
DDODU		
	CTS & SERVICES	
	Does the Entity offer the following products and services:	
	Correspondent Banking	Yes
19 a1	If Y	
19 a1a	Does the Entity offer Correspondent Banking services to domestic banks?	Yes
19 a1b	Does the Entity allow domestic bank clients to provide downstream relationships?	No
19 a1c	Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks?	No
19 a1d	Does the Entity offer Correspondent Banking services to foreign banks?	Yes
19 a1e	Does the Entity allow downstream relationships with foreign banks?	No
19 a1f	Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks?	No
19 a1g	Does the Entity offer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTSs)?	No
19 a1h	Does the Entity allow downstream relationships with MSBs, MVTSs, or Payment Service Provider (PSPs)?	
	MSBs	No
19 a1h1		No

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19 a1i	Does the Entity have processes and procedures in place to identify downstream relationships with	No
	MSBs /MVTSs/PSPs?	
19 b	Cross-Border Bulk Cash Delivery	No
19 c	Cross-Border Remittances	Yes International Internationa
19 d	Domestic Bulk Cash Delivery	No
19 e	Hold Mail	No
19 f	International Cash Letter	No
19 g	Low Price Securities	
19 h	Payable Through Accounts	No
19 i	Payment services to non-bank entities who may then offer third party payment services to their customers?	No
19 i1	If Y, please select all that apply below?	
19 i2	Third Party Payment Service Providers	No
19 i3	Virtual Asset Service Providers (VASPs)	No
19 i4	eCommerce Platforms	No
19 i5	Other - Please explain	
19 j	Private Banking	No
19 k	Remote Deposit Capture (RDC)	No
191	Sponsoring Private ATMs	No
19 m	Stored Value Instruments	No
19 n	Trade Finance	Yes
19 0	Virtual Assets	No
19 p	For each of the following please state whether you offer the service to walk-in customers and if so, the applicable level of due diligence:	
19 p1	Check cashing service	Yes
19 p1a	If yes, state the applicable level of due diligence	Identification and verification
19 p2	Wire transfers	No
19 p2a	If yes, state the applicable level of due diligence	Please select
19 p3	Foreign currency conversion	Yes
19 p3a	If yes, state the applicable level of due diligence	Identification
19 p4	Sale of Monetary Instruments If yes, state the applicable level of due diligence	No Please select
19 p4a 19 p5	If yes, state the applicable level of date singleheer If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence.	
19 q	Other high-risk products and services identified by the Entity (please specify)	Electronic Account
20	Confirm that all responses provided in the above Section are representative of all the LE's branches.	Yes
20 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
21	If appropriate, provide any additional information/context to the answers in this section.	
3. AML, 0	CTF & SANCTIONS PROGRAMME	
3. AML, 0	CTF & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:	
	Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the	Yes
22	Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:	Yes Yes
22 22 a	Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient	Yes Yes
22 22 a 22 b	Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient Adverse Information Screening	Yes Yes Yes Yes
22 22 a 22 b 22 c	Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient Adverse Information Screening Beneficial Ownership Cash Reporting CDD	Yes Yes Yes Yes Yes
22 a 22 b 22 c 22 d	Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD	Yes Yes Yes Yes Yes Yes
22 a 22 b 22 c 22 c 22 d 22 e 22 f 22 g	Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing	Yes Yes Yes Yes Yes Yes Yes Yes
22 a 22 b 22 c 22 d 22 c 22 d 22 e 22 f 22 g 22 h	Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing Periodic Review	Yes Yes Yes Yes Yes Yes Yes Yes
22 a 22 b 22 c 22 d 22 d 22 e 22 f 22 g 22 h 22 h 22 i	Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing Periodic Review Policies and Procedures	Yes Yes Yes Yes Yes Yes Yes Yes Yes Yes
222 a 22 b 22 c 22 c 22 c 22 e 22 f 22 g 22 h 22 j 22 j	Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing Periodic Review Policies and Procedures PEP Screening	Yes Yes Yes Yes Yes Yes Yes Yes Yes Yes
22 a 22 b 22 c 22 d 22 d 22 e 22 f 22 g 22 h 22 h 22 i	Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing Periodic Review Policies and Procedures	Yes

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22 m	Suspicious Activity Reporting	Yes	
22 n	Training and Education	Yes	
22 0	Transaction Monitoring	Yes	
23	How many full time employees are in the Entity's AML, CTF & Sanctions Compliance Department?	1-10	
24	Is the Entity's AML, CTF & Sanctions policy approved at least annually by the Board or equivalent Senior Management Committee? If N, describe your practice in Question 29.	Yes	-
25	Does the Board receive, assess, and challenge regular reporting on the status of the AML, CTF, & Sanctions programme?	Yes	
26	Does the Entity use third parties to carry out any components of its AML, CTF & Sanctions programme?	No	•
26 a	If Y, provide further details		
27	Does the entity have a whistleblower policy?	Yes	
28	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes	
28 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.		
29	If appropriate, provide any additional information/context to the answers in this section.		
4. ANTI E	BRIBERY & CORRUPTION		
30	Has the Entity documented policies and procedures consistent with applicable ABC regulations and requirements to reasonably prevent, detect and report bribery and corruption?	Yes	-
31	Does the Entity have an enterprise wide programme that sets minimum ABC standards?	No	
32	Has the Entity appointed a designated officer or officers with sufficient experience/expertise responsible for coordinating the ABC programme?	No	
33	Does the Entity have adequate staff with appropriate levels of experience/expertise to implement the ABC programme?	No	
34	Is the Entity's ABC programme applicable to:	Not Applicable	
35	Does the Entity have a global ABC policy that:		
35 a	Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly. If improperly intended to influence action or obtain an advantage.	Yes	-
35 b	Includes enhanced requirements regarding interaction with public officials?	Yes	-
35 c	Includes a prohibition against the falsification of books and records (this may be within the ABC policy or any other policy applicable to the Legal Entity)?	Yes	•
36	Does the Entity have controls in place to monitor the effectiveness of their ABC programme?	No	
37	Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme?	No	
38	Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months?	No	
38 a	If N, provide the date when the last ABC EWRA was completed.		
39	Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment?	No	•
40	Does the Entity's ABC EWRA cover the inherent risk components detailed below:	Yes	
40 a	Potential liability created by intermediaries and other third-party providers as appropriate	Yes	

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40 b	Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries	Yes
40 c	Transactions, products or services, including those that involve state-owned or state-controlled entities or public officials	Yes
40 d	Corruption risks associated with gifts and hospitality, hiring/internships, charitable donations and political contributions	Yes
40 e	Changes in business activities that may materially increase the Entity's corruption risk	Yes
41	Does the Entity's internal audit function or other independent third party cover ABC Policies and Procedures?	Yes
42	Does the Entity provide mandatory ABC training to:	
42 a	Board and senior Committee Management	No
42 b	1st Line of Defence	Yes
42 c	2nd Line of Defence	Yes
42 d	3rd Line of Defence	Yes
42 e	Third parties to which specific compliance activities subject to ABC risk have been outsourced	Not Applicable
42 f	Non-employed workers as appropriate (contractors/consultants)	Not Applicable
43	Does the Entity provide ABC training that is targeted to specific roles, responsibilities and activities?	Yes
44	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
44 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
45	If appropriate, provide any additional information/context to the answers in this section.	
5. AML.	CTF & SANCTIONS POLICIES & PROCEDURES	
46	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report:	
46 a	Money laundering	Yes
46 b	Terrorist financing	Yes
46 c	Sanctions violations	Yes
47	Are the Entity's policies and procedures updated at least annually?	Yes Ves
48	Has the Entity chosen to compare its policies and procedures against:	
48 a	U.S. Standards	Yes
48 a1	If Y, does the Entity retain a record of the results?	Yes
48 b	EU Standards	Yes
48 b1	If Y, does the Entity retain a record of the results?	Yes
49 49 a	Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts	Yes
49 b	Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs	Yes
49 c	Prohibit dealing with other entities that provide banking services to unlicensed banks	Yes
49 d	Prohibit accounts/relationships with shell banks	Yes
49 e	Prohibit dealing with another entity that provides services to shell banks	Yes
49 f	Prohibit opening and keeping of accounts for Section 311 designated entities	Yes
49 g	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
49 h	Assess the risks of relationships with domestic and foreign PEPs, including their family and close associates	Yes

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49 i	Define the process for escalating financial crime risk issues/potentially suspicious activity identified by employees	Yes	•
49 j	Define the process, where appropriate, for terminating existing customer relationships due to financial crime risk	Yes	-
49 k	Define the process for exiting clients for financial crime reasons that applies across the entity, including foreign branches and affiliates	Yes	-
491	Define the process and controls to identify and handle customers that were previously exited for financial crime reasons if they seek to re-establish a relationship	Yes	-
49 m	Outline the processes regarding screening for sanctions, PEPs and Adverse Media/Negative News	Yes	-
49 n	Outline the processes for the maintenance of internal "watchlists"	Yes	-
50	Has the Entity defined a risk tolerance statement or similar document which defines a risk boundary around their business?	Yes	-
51	Does the Entity have record retention procedures that comply with applicable laws?	Yes	-
51 a	If Y, what is the retention period?	5 years or more	
52	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes	-
52 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.		
53	If appropriate, provide any additional information/context to the answers in this section.	many of Syrian entity is in American and European list.	
6 AML C	TF & SANCTIONS RISK ASSESSMENT		
54	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:		
54 a	Client	Yes	
54 b	Product	Yes	
54 c	Channel	Yes	
54 d	Geography	Yes	
55	Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below:		
55 a	Transaction Monitoring	Yes	
55 b	Customer Due Diligence	Yes	
55 c	PEP Identification	Yes	
55 d 55 e	Transaction Screening Name Screening against Adverse Media/Negative	Yes	-
/	News		
55 f	Training and Education	Yes	
55 g 55 h	Governance Management Information	Yes	
56	Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months?	Yes Yes	
56 a	If N, provide the date when the last AML & CTF EWRA was completed.		_
57	Does the Entity's Sanctions EWRA cover the inherent risk components detailed below:		
57 a	Client	Yes	
57 b	Product	Yes	
57 c	Channel	Yes	
57 d	Geography	Yes	
58	Does the Entity's Sanctions EWRA cover the controls		
	effectiveness components detailed below:		
58 a	effectiveness components detailed below: Customer Due Diligence	Yes	
58 b	Customer Due Diligence Governance	Yes Yes	V
	Customer Due Diligence		

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60.	No. O		
58 e	Name Screening	Yes	
58 f	Transaction Screening	Yes	
58 g	Training and Education	Yes	
59		100	
29	Has the Entity's Sanctions EWRA been completed in the last 12 months?	Yes	-
59 a	If N, provide the date when the last Sanctions		
	EWRA was completed.		
60	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes	
60 a	If N, clarify which questions the difference/s relate to		
	and the branch/es that this applies to.		
61	If appropriate, provide any additional information/context to the answers in this section.		
7. KYC,	CDD and EDD		_
62	Does the Entity verify the identity of the customer?	Yes	
63	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	-
64	Which of the following does the Entity gather and retain when conducting CDD? Select all that apply		
64 a	Customer identification		
		Yes	
64 b	Expected activity	Yes	
64 c	Nature of business/employment	Yes	
64 d	Ownership structure	Yes	
64 e	Product usage	Yes	
	, i i i i i i i i i i i i i i i i i i i		
64 f	Purpose and nature of relationship	Yes	
64 g	Source of funds	Yes	
64 h	Source of wealth	Yes	
65	Are each of the following identified:		
65 a	Ultimate beneficial ownership	Yes	
65 a1	Are ultimate beneficial owners verified?		
		Yes	
65 b	Authorised signatories (where applicable)	Yes	
65 c	Key controllers	Yes	
65 d	Other relevant parties	Yes	
66	What is the Entity's minimum (lowest) threshold applied to beneficial ownership identification?	Other (specify the percentage)	
67	Does the due diligence process result in customers receiving a risk classification?	Yes	-
67 a	If Y, what factors/criteria are used to determine the customer's risk classification? Select all that apply.		
67 a1	Product Usage	Yes	
67 a2	Geography	Yes	
67 a3	Business Type/Industry	Yes	
67 a4	Legal Entity type	Yes	
67 a5	Adverse Information	Yes	
67 a6	Other (specify)	regulator instruction, channels used, inquired by combating money laundening & terrorism financing commission, if there is beneficial owner other than the account holder.	
68	For high risk non-individual customers, is a site visit a part of your KYC process?	No	
68 a	If Y, is this at		
68 a1	Onboarding	Please select	
68 a2	KYC renewal	Please select	
68 a3	Trigger event	Please select	
68 a4 68 a4a	Other If yes, please specify "Other"	Please select	
69	Does the Entity have a risk based approach to		
	screening customers for Adverse Media/Negative News?	No	
69 a	If Y, is this at:		
69 a1	Onboarding	Please select	
69 a2	KYC renewal	Please select	

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69 a3	Trigger event	Please select	
70	What is the method used by the Entity to screen for		
71	Adverse Media/Negative News?	manual	
/ 1	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	-
71 a	If Y, is this at		
71 a1	Onboarding	Yes	
71 a2	KYC renewal	Yes	
71 a3	Trigger event	No	-
72	What is the method used by the Entity to screen PEPs?	Manual	
73	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	
74	Is KYC renewed at defined frequencies based on risk rating (Periodic Reviews)?	Yes	-
74 a	If yes, select all that apply:		
74 a1	Less than one year	Please select	
74 a2	1 – 2 years	Yes	
74 a3	3 – 4 years	Yes	N.2
74 a4	5 years or more	Please select	
74 a5 74 a6	Trigger-based or perpetual monitoring reviews	Yes	×.
	Other (Please specify)		
75	Does the Entity maintain and report metrics on current and past periodic or trigger event due diligence reviews?	Yes	-
76	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?		
76 a	Arms, defence, military	EDD on risk-based approach	
76 b	Respondent Banks	EDD on nsk-based approach	
76 b1	If EDD or restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022?	Yes	-
76 c	Embassies/Consulates	EDD on nsk-based approach	
76 d	Extractive industries	EDD on risk-based approach	
76 e		Prohibited	
	Gambling customers		
76 f	General Trading Companies	Do not have this category of customer or industry	
76 g	Manjuana-related Entities	Prohibited	
76 h	MSB/MVTS customers	Always subject to EDD	
76 i	Non-account customers	EDD on nsk-based approach	
76 j	Non-Government Organisations	Always subject to EDD	
76 k	Non-resident customers	EDD on nsk-based approach	
761	Nuclear power	Do not have this category of customer or industry	
76 m	Payment Service Providers	EDD on nsk-based approach	
76 n	PEPs	EDD on nsk-based approach	
76 0	PEP Close Associates	EDD on risk-based approach	
		EDD on risk-based approach	
76 p	PEP Related		
76 q	Precious metals and stones	EDD on risk-based approach	
76 r	Red light businesses/Adult entertainment	Do not have this category of customer or industry	
76 s	Regulated chanties	EDD on nsk-based approach	
76 t	Shell banks	Prohibited	
76 u	Travel and Tour Companies	EDD on nsk-based approach	
76 v	Unregulated charities	Prohibited	4 4 4 4
76 w	Used Car Dealers	EDD on risk-based approach	
76 x	Virtual Asset Service Providers	Prohibited	
76 y	Other (specify)		
77	If restricted, provide details of the restriction		
78	Does EDD require senior business management and/ or compliance approval?	Yes	-



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78 a	If Y indicate who provides the approval:	Both	
79	Does the Entity have specific procedures for		
	onboarding entities that handle client money such as	Yes	-
	lawyers, accountants, consultants, real estate agents?		
80	Does the Entity perform an additional control or		
	guality review on clients subject to EDD?	Yes	•
81	Confirm that all responses provided in the above		-
01		Yes	-
	Section are representative of all the LE's branches		
81 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to		
82	If appropriate, provide any additional information/context to the answers in this section.		
8. MONIT	FORING & REPORTING		
0.2	Does the Entity have risk based policies, procedures		
83	and monitoring processes for the identification and reporting of suspicious activity?	Yes	•
84	What is the method used by the Entity to monitor transactions for suspicious activities?	Combination of automated and manual	•
84 a	If manual or combination selected, specify what type of transactions are monitored manually	transaction beyond specific limits, transaction related to same client or related group within, specific limits, transaction at the edge of specific limits, transaction placed by third partyetc	
84 b	If automated or combination selected, are internal system or vendor-sourced tools used?	Both	
84 b1	If 'Vendor-sourced tool' or 'Both' selected, what is the name of the vendor/tool?	Compass	
84 b2	When was the tool last updated?	< 1 year	•
84 b3	When was the automated Transaction Monitoring application last calibrated?	< 1 year	
85	Does the Entity have regulatory requirements to report suspicious transactions?	Yes	-
85 a	If Y, does the Entity have policies, procedures and processes to comply with suspicious transaction reporting requirements?	Yes	-
86	Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity?	Yes	-
87	Does the Entity have a data quality management programme to ensure that complete data for all transactions are subject to monitoring?	Yes	•
88	Does the Entity have processes in place to respond to Request For Information (RFIs) from other entities in a timely manner?	Yes	•
89	Does the Entity have processes in place to send Requests for Information (RFIs) to their customers in a timely manner?	Yes	-
90	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes	-
90 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to		
91	If appropriate, provide any additional information/context to the answers in this section.		
O DAVIS	IENT TRANSPARENCY		
	Den the Eather address to the Malfahara Oraus		
92	Does the Entity adhere to the Wolfsberg Group	Yes	-
1	Payment Transparency Standards?		

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93	Does the Entity have policies, procedures and processes to comply with and have controls in place to ensure compliance with:		
93 a	FATF Recommendation 16	Yes	
93 b	Local Regulations	Yes	Y
93 b1	If Y, specify the regulation	regulation19 issued by Combating Money Laundering & Terrorism Financing Commission	
93 c	lf N, explain		
94	Does the Entity have controls to support the inclusion of required and accurate originator information in cross border payment messages?	Yes	•
95	Does the Entity have controls to support the inclusion of required beneficiary information cross-border payment messages?	Yes	-
95 a	If Y, does the Entity have procedures to include beneficiary address including country in cross border payments?	Yes	-
96	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes	•
96 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.		
97	If appropriate, provide any additional information/context to the answers in this section.		
10. SANC			_
98	Does the Entity have a Sanctions Policy approved by management regarding compliance with sanctions law applicable to the Entity, including with respect to its business conducted with, or through accounts held at foreign financial institutions?	Yes	•
99	Does the Entity have policies, procedures, or other controls reasonably designed to prevent the use of another entity's accounts or services in a manner causing the other entity to violate sanctions prohibitions applicable to the other entity (including prohibitions within the other entity's local jurisdiction)?	Yes	•
100	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	•
101	Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists?	Yes	-
102	What is the method used by the Entity for sanctions screening?	Automated	
102 a	If 'automated' or 'both automated and manual' selected:		
102 a1	Are internal system of vendor-sourced tools used?	Vendor-sourced tools	
102 a1a	If a 'vendor-sourced tool' or 'both' selected, what is the name of the vendor/tool?	Compass	
102 a2	When did you last test the effectiveness (of finding true matches) and completeness (lack of missing data) of the matching configuration of the automated tool? (If 'Other' please explain in Question 110)	< 1 year	•
103	Does the Entity screen all sanctions relevant data, including at a minimum, entity and location information, contained in cross border transactions against Sanctions Lists?	Yes	-
104	What is the method used by the Entity?	Combination of automated and manual	

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N.

programme to ensure that complete data for all transactions are subject to sanctions screening? Yes 106 Select the Sanctions Lists used by the Entity in its sanctions screening processes: Used for screening customers and beneficial owners (i.e. reference data) 106 a Consolidated United Nations Security Council Used for screening customers and beneficial owners (i.e. reference data) 106 b United States Department of the Treasury's Office of Foreign Assets Control (OFAC) Used for screening customers and beneficial owners (i.e. reference data) 106 c Office of Financial Sanctions Implementation HMT (OFSI) Not used 106 d European Union Consolidated List (EU) Used for screening customers and beneficial owners (i.e. reference data) 106 e Lists maintained by other G7 member countries Not used 107 b Other (specify) Local List 108 f Other (specify) Same day to 2 business days 107 b Transactions Same day to 2 business days 107 b Transactions are origined astictories provide actions Yes 108 d Customer Data Same day to 2 business days 109 content tail aresponses provide (in the bave Saction are representative offices for action are representative offices for area ensures for all the bave sactions Yes 109 a<			
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		Confirm that all responses provided in the above	Yes

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115 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
116	If appropriate, provide any additional information/context to the answers in this section.	
12. QUALI	TY ASSURANCE /COMPLIANCE TESTING	
117	Does the Entity have a program wide risk based	
	Quality Assurance programme for financial crime (separate from the independent Audit function)?	No
118	Does the Entity have a program wide risk based Compliance Testing process (separate from the independent Audit function)?	No
119	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
119 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
120	If appropriate, provide any additional information/context to the answers in this section.	
13. AUDIT		
121	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, ABC, Fraud and Sanctions policies and practices on a regular basis?	Yes
122	How often is the Entity audited on its AML, CTF, ABC, Fraud and Sanctions programme by the following:	
122 a	Internal Audit Department	Compenent-based reviews
122 b	External Third Party	Not Applicable
123	Does the internal audit function or other independent third party cover the following areas:	
123 a	AML, CTF, ABC, Fraud and Sanctions policy and procedures	Yes
123 b	Enterprise Wide Risk Assessment	Yes
123 c 123 d	Governance KYC/CDD/EDD and underlying methodologies	Yes
123 d	Name Screening & List Management	Yes
123 f	Reporting/Metrics & Management Information	Yes
123 g	Suspicious Activity Filing	Yes
123 h	Technology	Yes
123 i	Transaction Monitoring	Yes
123 j	Transaction Screening including for sanctions	Yes
123 k	Training & Education	Yes
123 I	Other (specify)	
124	Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness?	Yes
125	Confirm that all responses provided in the above section are representative of all the LE's branches	Yes
125 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
126	If appropriate, provide any additional information/context to the answers in this section.	
14. FRA	UD	
127	Does the Entity have policies in place addressing fraud risk?	No
128	Does the Entity have a dedicated team responsible for preventing & detecting fraud?	No



129	Does the Entity have real time monitoring to detect fraud?	No
130	Do the Entity's processes include gathering additional information to support its fraud controls, for example: IP address, GPS location, and/or device ID?	Yes
131	Confirm that all responses provided in the above section are representative of all the LE's branches	Yes
131 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
132	If appropriate, provide any additional information/context to the answers in this section.	
Declaration Statement Wolfsberg Group Correspondent Banking Due Diligence Questionnaire 2023 (CBDDQ V1.4) Declaration Statement (To be signed by Global Head of Correspondent Banking or equivalent position holder AND Group Money Laundering Prevention Officer, Global Head of Anti- Money Laundering, Chief Compliance Officer, Global Head of Financial Crimes Compliance OR equivalent)		
Arab Bank-Syria (Financial Institution name) is fully committed to the fight against financial crime and makes every effort to remain in full compliance with all applicable financial crime laws, regulations and standards in all of the jurisdictions in which it does business and holds accounts.		
The Financial Institution understands the critical importance of having effective and sustainable controls to combat financial crime in order to protect its reputation and to meet its legal and regulatory obligations.		
The Financial Institution recognises the importance of transparency regarding parties to transactions in international payments and has adopted/is committed to adopting these standards.		
The Financial Institution further certifies it complies with / is working to comply with the Wolfsberg Correspondent Banking Principles and the Wolfsberg Trade Finance Principles. The information provided in this Wolfsberg CBDDQ will be kept current and will be updated no less frequently than every eighteen months.		
The Financial Institution commits to file accurate supplemental information on a timely basis.		
I. Mr. Ghassan Abo Al Neel (Global Head of Correspondent Banking or equivalent), certify that I have read and understood this declaration, that the answers provided in this Wolfsperg CBDDC are complete and correct to my honest belief, and that I am authorised to execute this declaration on behalf of the Financial I. Mohammad Saleh Wolfsberg CBDDC are complete and correct to my honest belief, and that I have read and understood this declaration, that the answers provided in this Wolfsberg CBDDC are complete and correct to my honest belief, and that I am authorised to execute this declaration on behalf of the Financial Institution. 1. Mohammad Saleh Wolfsberg CBDDC are complete and correct to my honest belief, and that I am authorised to execute this declaration on behalf of the Financial Institution. 13/3/2023 (Signature & Date) (Signature & Date)		
CAND-5		