

Doha Bank (Q.P.S.C.) Policy Statement on AML CFT CFP and Tax Compliance

Doha Bank (Q.P.S.C.) Policy statement on:

- Anti-Money Laundering and Countering Financing Terrorism and Countering Financing Proliferation of Weapon of Mass Destruction (AML/CFT & CFP).
- Tax Compliance - Foreign Account Tax Compliance Act (FATCA) and Common Reporting Standard (CRS).

Doha Bank (Q.P.S.C) a Qatari Public Shareholding Company was incorporated in 1979, in the State of Qatar. Doha Bank offers a comprehensive portfolio of customer-focused services within the conventional banking space and provides a wide range of banking services both domestic and international – to individual, commercial, corporate, and institutional clients. These services are delivered through four key business groups: Wholesale Banking, Treasury & Investments, International Banking, and Retail Banking. To support its international operations, Doha Bank has established branches in Kuwait, the United Arab Emirates, and India, along with representative offices in strategic locations including Japan, China, Singapore, South Africa, Turkey, the United Kingdom, Bangladesh, and Nepal. Doha Bank is listed on the Qatar Stock Exchange (QSE) and operates under the regulatory oversight of the Qatar Central Bank (QCB) and Qatar Financial Markets Authority (QFMA), in line with the guidance and instructions issued periodically.

In a global marketplace, the attempt to use financial institutions to Launder Money, Terrorist financing and Proliferation of Weapons of Mass Destruction (PWMD) is a significant problem that has caused great concern in the international community and has resulted in the passage of stricter laws and increased penalties for these crimes.

Keeping in view the Global menace of Money Laundering (ML) Terrorist Financing (TF), and Proliferation of Weapons of Mass Destruction (PWMD) the bank is stringently focusing on core Compliance functions and KYC & AML Policies and Procedures. The Bank has prepared a comprehensive Anti Money-Laundering/Combating Financing Terrorism Policy and Procedures that are well in place and implemented and are in compliance with the recommendations issued by Financial Action Task Force (FATF) and Qatar law No 20 of 2019 on Combating Money Laundering and Terrorism Financing and instructions issued by Qatar Central Bank and Central Banks of other Jurisdictions where Doha Bank operates.

This Policy statement is meant to set the minimum standards to which Doha Bank will adhere to. In any case where the requirements of applicable money laundering laws establish a higher standard, Doha Bank will adhere to those laws. However, under all circumstances Doha Bank will conduct its business in compliance with the following general principles:

- Protect Doha Bank from Money Laundering (ML), Terrorist Financing (TF) and Proliferation of Weapons of Mass Destruction (PWMD).
- Maintain a written AML/CFT policy and procedures which is approved by Board of Directors, a system of internal controls to ensure ongoing AML compliance by a designated person(s) and take appropriate action, once suspicious activity is detected, a proper and thorough process for filing Suspicious Transaction Report is followed as per the requirements of Central Bank & applicable laws (Local & International).

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- Comply with applicable Anti-Money Laundering, Combatting Terrorist Financing and Proliferation of Weapons of Mass Destruction (PWMD) laws and regulations as established by Qatar Central Bank and respective Central Banks in each jurisdiction that is in accordance with the recommendations of the Financial Action Task Force on Money Laundering (ML), Terrorist Financing (TF) & Proliferation of Weapons of Mass Destruction (PWMD).
- The Bank's Anti-Money Laundering/Combating Financing Terrorism policies will apply to all business Units and functions. This includes the Customer Acceptance Policy, Customer identification process, Customer Risk based classification and Know Your Customer (KYC) Procedures and the periodic and trigger KYC updates.
- Report all identified suspicious activities and other regulatory reports with the relevant Authorities to the extent that it can do so under all applicable foreign and domestic laws.
- Compliance with the Bank's Anti-Money Laundering/Combating Financing Terrorism policies will be monitored through a combination of Internal Audit, External Audit and regulatory reviews of compliance with relevant Anti-Money Laundering, Combating of Financing Terrorism legislation and/or regulations.
- Doha Bank is maintaining correspondent banking relationships with a number of banks and in that particular reference, Doha Bank performs due diligence on them and also obtains USA Patriot Act Certification along with other documents as per the regulatory requirements. All correspondent banking relationships are subject to appropriate customer due diligence, monitoring and review.
- Retaining all the customer related documents for a period specified as per local laws in each jurisdiction.
- Doha Bank does not conduct business with Shell Banks. In addition to this, Doha Bank does not offer services of opening anonymous accounts and payable through accounts.
- Abide with AML, CFT & CFP requirements regarding Outsourced Activities.
- Cooperate fully with law enforcement and regulatory agencies to the extent that it can do so under all applicable foreign and domestic laws.
- Train staff on Know Your Customer and Anti-Money Laundering/ Combating Financing Terrorism policies and new AML /CFT / PWMD laws and regulations as per plans and maintain the records of training sessions including attendance records and relevant training materials used. The Training & Career Development Unit has an ongoing training program focused on Anti Money Laundering /Counter Financing of Terrorism/Proliferation of Weapons of Mass Destruction, incorporating legislative updates and regulatory changes..
- Maintaining and updating a list of suspected individuals and organizations as circulated and updated by competent authorities.
- Conducting risk-based assessment of our customers.
- Enhanced Due Diligence for high-risk Customers.
- Obtain all account opening documentation requirements as per regulations and applicable standards.
- Does not entertain, Prohibited Accounts, as instructed by regulators.

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- Obtain necessary supporting documents while conducting transactions.
- Doha Bank does not engage in activities involving Virtual Assets or Virtual Asset Service Providers (VASPs).
- Doha Bank has a robust AML CFT Transaction monitoring system in place to monitor customer transactions that generates alerts & these are reviewed by the designated persons in each jurisdiction. The transaction alerts are analyzed within a reasonable period of time. Any suspicious transactions are reported to the MLRO/DMLRO for further analysis and reporting to the relevant authorities.
- Comprehensive Screening Process that includes – Real time online screening, Database/Offline screening for the entire portfolio at regular intervals and screening for Remittances/Trade Transactions against sanction and applicable official blacklisted lists. The suspicious matches are reported to the MLRO/DMLRO for further investigation and proper action and reporting to the relevant authorities where applicable.
- The Qatar Central Bank Financial Crimes Compliance Department and (Financial Information Unit) are monitoring and supervising the functions of AML/CFT Policies and Procedures of all the banks in Qatar.
- Doha Bank applies global initiatives to improve tax transparency and compliance requirements across Doha Bank operating jurisdictions such as the US Foreign Account Tax Compliance Act (FATCA) and the OECD's Standard for Automatic Exchange of Financial Account Information (also known as the Common Reporting Standard -CRS).
- Doha Bank is fully compliant with OECD Common Reporting Standards (CRS) in each jurisdiction where Doha Bank is operating in accordance with the applicable local regulatory requirements
- FATCA status of Doha Bank is reporting model 1 FFI and the Global Intermediary Identification Number (GIIN) is as follows

<u>Entity</u>	<u>GIIN</u>
Doha Bank Q.P.S.C. Qatar	DZDWPS.99999.SL.634
Doha Bank, UAE Branch	DZDWPS.99999.BR.784
Doha Bank, Kuwait Branch	DZDWPS.99999.BR.414
Doha Bank India Branches	DZDWPS.99999.BR.356

For more information on Doha Bank and Qatar Central Bank please visit:

- Doha Bank web site: www.dohabank.com.qa
- Qatar Central Bank: www.qcb.gov.qa

Doha Bank (Q.P.S.C.)
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