

## Financial Institution Questionnaire

### ENTITY INFORMATION:

Name of FI/Entity:	KFH CAPITAL INVESTMENT COMPANY (K.S.C.C)	
Registered Office Address:	Abdullah Al-Salem Street, Block 10, Building 3 Floor 32, Unit 1, Qibla, Assima, Kuwait, Po Box 3946 - Safat 13040 Kuwait	
Website Address:	<a href="http://www.kfhcapital.com.kw">www.kfhcapital.com.kw</a>	
Country of Incorporation:	State Of Kuwait	
Commercial Registration Number:	76471	
Commercial Registration Expiration Date:	17/04/2029	
License Number:	1999/603	
Is your institution/Entity (or parent company) publicly traded?	Yes, the parent company is Kuwait Finance House and it is a publicly traded company in Boursa Kuwait (Ticker: KFH - Stock Number: 108)	
Officer who is responsible for the FI's Anti-Money Laundering Program (MLRO):	MLRO Name:	Basil Abdulrahman AlBaker
	Title:	Chief Compliance and Corporate Governance Officer
	Email Address:	<a href="mailto:Balbaker@kfhcapital.com.kw">Balbaker@kfhcapital.com.kw</a>
Main Contact for FI:	<a href="mailto:info@kfhcapital.com.kw">info@kfhcapital.com.kw</a>	
Please indicate the primary business activities of the institution:	Islamic Investment	
Total Number of employees within the Compliance & AML/CFT Department:	6	
Is your FI registered under FATCA?	Yes; GIIN: VWIFL1.00000.LE.414	

### MANAGEMENT & SHAREHOLDER INFORMATION:

Please refer to KFH Capital Investment Company's website: [www.kfhcapital.com.kw](http://www.kfhcapital.com.kw) for information on the Board of Directors, Executive Management, and shareholder's information.

**LEGISLATION & TRAINING:**

Has your country of registration / incorporation established laws and regulations to Combat Money Laundering and Terrorism Financing?

Yes

Relevant Laws and Regulations:

- ***Kuwait law concerning Combating Money Laundering and Terrorism Financing Law No. 106/2013***
- ***Decision No (37) of 2013 On Executive Regulation for the Anti-Money Laundering and Combating Terrorism Financing Law (106) of 2013 and its amendments.***
- ***Ministerial Resolution issued by the Committee for the Implementation of Security Council Resolutions under Chapter VII of the United Nations Charter formed at the Kuwait's Ministry of Foreign Affairs No. 141 issued on July 7th, 2023.***
- ***Kuwait Capital Markets Authority Resolution No. (72) of 2015 Regarding Issuance of the Executive Bylaws of Law No. (7) of 2010 and its Amendments Regarding the Establishment of the Capital Markets Authority and Regulating Securities Activities.***

Is your country a member of Financial Action Task Force (FATF) or a global/regional style body?

Yes

Name of your Financial Intelligence Unit (FIU):

**Kuwait Financial Intelligence Unit "KFIU"**

Does your country's legislation require you to comply with customer due diligence measures when:

a) Establishing a business relationship?

Yes

b) Carrying out transactions with significant value and/or information?

Yes

Does your country's legislation require you to include the following within the customer due diligence processes:

a) Identifying the customer and verifying the customer's identity based on documents, data or information obtained from a reliable and independent source?

Yes

b) Identifying the beneficial owner and verifying his/her government issued identity papers?

Yes

c) Conducting on-going monitoring of the business relationship?

Yes

Does your country legislation prohibit you from keeping anonymous / numbered accounts or accounts in fictitious names?

Yes

Does your country legislation require you to have enhanced due diligence measures for transactions or business relationships with "Politically Exposed Persons ("PEP")?"

Yes

Primary Regulator's Information:

**Capital Markets Authority of the State of Kuwait "CMA"**

Does your institution have an employee-training program to train employees about Anti-Money Laundering & Terrorist Financing that includes:

a) Identification and reporting of transactions that must be reported to government authorities.	Yes
b) Identifying / reporting suspicious activities	Yes
c) Examples of different forms of Money Laundering involving FI's products and services.	Yes
d) Internal policies to prevent Money Laundering, combating Terrorism Financing and Sanctions Compliance.	Yes
e) Awareness of various applicable Sanctions programs and review of account activity / transactions to identify and deter threats of Sanctions' violation.	Yes
Does your institution retain records of its training sessions including attendance records and relevant training materials used?	Yes
Does your institution communicate new AML related laws, or changes to existing AML related policies or practices to relevant employees?	Yes
Does your institution employ third parties to carry out some of the AML functions and processes of the FI?	Yes

**AML/CFT POLICIES AND PROCEDURES:**

Is the AML Compliance program approved by your Institution's Board of Directors or a Senior Committee?	Yes, KFH Capital Board of Directors
Does the FI review these Policies & Procedures on periodic basis?	Yes
Has your FI implemented written Policies & Procedures on KYC?	Yes
Has your FI developed written Policies documenting the processes that they have in-place to prevent, detect and report suspicious transactions approved by Senior Management?	Yes
Does your FI have a policy prohibiting accounts/relationships with Shell Banks?	Yes
Does your FI have Policies to reasonably ensure that they will not conduct transactions with or on behalf of Shell Banks through its accounts or products?	Yes
Does your FI have Policies covering relationships with Politically Exposed Persons (PEPs), their family and close associates?	Yes
Does your FI have a Record Retention Procedures?	Yes

Does your FI require the Identification and Verification of Beneficial Owners?	Yes, as per the CMA's instructions direct/indirect ownership of 25% and require the entity's Controllers ( <i>Board of Director, Chief executive Officer and all their deputies that fulfil a similar role (Managing day to day Business), and/or Authorized Signatories</i> )
Please describe your FI's controls and measures when dealing with High-risk customers.	KFH Capital abides by the Capital Markets Authority's instructions with regards to High-risk customers, where the company takes Enhanced Due Diligence measures on all High-risk customers during the following stages: <ul style="list-style-type: none"> <li>- During on-boarding,</li> <li>- Review/recertification, and</li> <li>- On every transaction conducted.</li> </ul> The company scrutinize such customers' profiles and transactions.
Please describe your FI's controls and measures when dealing with PEPs.	The Politically Exposed Persons (PEPs) implements Enhanced Due Diligence (EDD) measures on all sorts of PEPs by: <ul style="list-style-type: none"> <li>- Obtaining top management approval,</li> <li>- Obtaining the source of wealth and funds, and</li> <li>- Scrutinize all transactions through continuous monitoring.</li> </ul>

**SCREENING MEASURES:**

Sanctions Screening:	Lists Screened	<ul style="list-style-type: none"> <li>- Office of Foreign Assets &amp; Control (OFAC)</li> <li>- United Nations (UN)</li> <li>- European Union (EU)</li> <li>- UK HM Treasury (HMT)</li> <li>- Kuwait Ministry of Foreign Affairs (MoFA)</li> <li>- Kuwait Capital Markets authority</li> </ul>
	Level of Automation	Automated
	Timing of Customer-Base Screening against Sanctions lists	<ul style="list-style-type: none"> <li>- During on-boarding</li> <li>- During customer periodic review</li> <li>- At any ad-hoc review</li> <li>- Whenever any changes to any of the International Sanctions lists</li> </ul>
	Transactions Screening	All transactions conducted within the company

Does your FI process transactions on behalf of sanctioned countries, entities, and/or individuals?	No
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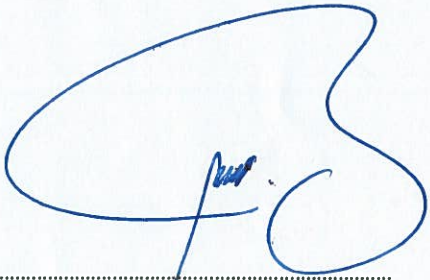
Has the FI implemented controls to identify customers that are targeted by sanctions at on-boarding and during the customer life cycle (post on-boarding)? Please provide a summary of he controls.	KFH Capital Investment Company does not tolerate any exposure to any sanctioned parties and abides by all applicable Sanctions Programs. The Company utilizes several systems and processes to identify and detect any potential sanctions and eliminate it, if any.
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Monitoring & Name Screening:	Transactions Monitoring:	Automated
	Name Screening:	Automated

**RISK ASSESSMENT:**

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Does your FI comply with FATF's Risk-Based Approach (RBA): Customer Type, Geographical locations, Products & Services, and Distribution Channels?	<b>Yes, KFH Capital Investment Company applies the RBA of FATF within the AML/CFT Risk Assessment and when profiling a customer.</b>
Does your FI classify customers into various risk sensitivity levels?	<b>Yes</b>
May the risk classification be reviewed in case of triggered events (i.e., Negative News / Adverse Media)?	<b>Yes</b>



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**Basil Abdulrahman AlBaker**  
**Chief Compliance and Corporate Governance Officer**

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