

KFH Capital Investment Company:

AML/CTF & Economic Sanctions Statement



KFH Capital Investment Company (“the Company”) is a registered financial institution within the State of Kuwait, supervised and regulated by the Capital Market Authority (“CMA”). The Company abides by the State of Kuwait local laws and regulations related to Combating Money Laundering, Financing of Terrorism, and Economic Sanctions as well as the International Best Practices in this regard. In addition, and as the State of Kuwait is a member of Middle East & North Africa Financial Action Task Force (MENA-FATF), which is a member of the Global Network of the Financial Action Task Force (FATF); the company follows and abides by FATF’s recommendations.

KFH Capital abides by all applicable Sanctions’ Programs including but limited to the United Nations, the United States’ Office of Foreign Assets and Control (OFAC), the European Union (EU), the United Kingdom’s HM Treasury (HMT), and the Ministry of Foreign Affairs of the State of Kuwait (MoFA).

The Company implements a Risk-Based Approach when it comes to its AML/CFT & Economic Sanctions Program as recommended by FATF.

KFH Capital Maintains written internal Policies & Procedures that are approved by the Company’s Board of Directors and in-compliance with the State of Kuwait laws Combating Money Laundering and Financing of Terrorism laws and regulations, including the Capital Market Authority’s Law and Executive Bylaws. The Company is inline with the International Best Practices in relation to Combating Money Laundry and Financing of Terrorism. The Compliance and Corporate Governance Department is responsible within the Company in the implementation of the Anti-Money Laundering & Financing of Terrorism Program that includes:

- *Written Policies & Procedures that clarifies the internal controls, principles and guidelines of Due Diligence implemented in order to identify and verify the Company’s customers, among them are the following:*
 - *Collection and Verification of information during account on-boarding and recertification to identify the customer and Ultimate Beneficial Owner (“UBO”) identity and information through utilizing Know Your Customer (KYC) standards,*

KFH Capital Investment Company:

AML/CTF & Economic Sanctions Statement



- *Obtain all required supporting documentations,*
- *Retaining customer and UBO information,*
- *Name Screen the names of Customers and UBOs against the local and international watchlists.*
- *Treating all regulatory authorities requests for information and documents in a timely manner.*
- *Determining the responsible individuals to implement the Department's Policies & Procedures.*
- *Clear guidelines to review, update, and retain records.*
- *Systems to assess and monitor Money Laundering and Terrorism Financing risks that takes into consideration:*
 - *Customers' risks,*
 - *Geographical or countries-related risks,*
 - *Products & services, transactions and Distribution channels risks.*
- *Appropriate means and methods to monitor customers' transactions and activities in order to detect any unusual or suspicious activities and report them to the competent authorities.*
- *Continuous AML/CTF training and awareness programs.*
- *Ensuring the implementation of Internal and External audits on the Program.*



.....

Basil Abdulrahman AlBaker

Chief Compliance and Corporate Governance Officer