

Commercial Bank of Kuwait K.P.S.C.
State of Kuwait

AML/CFT & KYC Questionnaire

General Information

Name of the Bank	Commercial Bank of Kuwait K.P.S.C.
Country of Incorporation	State of Kuwait
Legal Status	Kuwaiti Public Shareholding Company (K.P.S.C.)
Commercial Registration Number	7706
Establishment Date	19 June 1960
Website	www.cbk.com
Registered Address	Al-Qibla, Block 5, Mubarak Al-Kabir Street, Kuwait City, State of Kuwait
Mailing Address	P.O. Box 2861, Safat 13029, State of Kuwait
Line of Business	Corporate Lending, Trade Finance, Treasury, Retail Banking, International Banking and Investment
Major Shareholders	Please refer to: https://www.boursakuwait.com.kw/ar/stock/profile#103
Board of Directors	Please refer to: https://www.cbk.com/About-CBK/CBK-Profile/Board-of-Directors
Executive Management	Please refer to: https://www.cbk.com/About-CBK/CBK-Profile/Executive-and-Supervisory-Management
Chief Executive Officer	Elham Yousry Mahfouz
AML Officer	Abdulaziz Mustafa Ali Head of AML & CFT Department
Number of Local Branches	41
Number of Foreign Branches	Nil
Regulator	Central Bank of Kuwait www.cbk.gov.kw
External Auditors	RSM Albazie & Partners Deloitte & Touche – Al-Wazzan & Co. BDO Kuwait – Al-Nisf & Partners
Stock Exchange Listing	Bursa Kuwait
FATCA Compliance Status	Compliant
GIIN	7SYKUR.00000.LE.414
TIN	115142

Bank AML/CFT Questionnaire

This questionnaire provides information about Commercial Bank of Kuwait (CBK) and its AML/CFT policies and procedures.

A – Corporate Information	
Full registered name Commercial Bank of Kuwait K.P.S.C.	
Full registered address Al-Qibla, Block 5, Mubarak Al-Kabir Street, Kuwait City, State of Kuwait	
Type of licence Banking	Issuing authority Ministry of Commerce and Industry
Registration number 7706	Regulatory body (if other than the licence issuing authority) Central Bank of Kuwait
Main line of business Carrying out all banking activities.	
Total number of domestic branches 41	Total number of foreign branches Nil
Website www.cbk.com	
Listed entity Yes ☒ No ☐	Stock exchange: Boursa Kuwait Exchange website: www.boursakuwait.com.kw Ticker / Code: CBK / 103
AML contact Abdulaziz Mustafa Ali	Job title Head of AML & CFT Department
Email aaziz@cbk.com	Phone +965 2299 0926

B – Ownership	Yes	No
1. Is your institution publicly owned?	Yes ☒	No ☐
If “Yes”, please provide the names of the individual(s)/legal person(s) or group owning 5% or more of your share capital: Please refer to: https://www.boursakuwait.com.kw/ar/stock/profile#103		
2. Confirm that your institution has performed appropriate due diligence on all principal owners.	Yes ☒	No ☐
3. Is any of the owners, Board members or Executive Management a PEP or related to a PEP? If “Yes”, please provide the name, relationship and shareholding %.	Yes ☐	No ☒

C – Regulatory Framework	Yes	No
4. Are money laundering and terrorist financing criminal offences in your jurisdiction?	Yes ☒	No ☐
5. Are there specific laws and/or regulations covering Anti-Money Laundering and Combating the Financing of Terrorism (AML/CFT)? If “Yes”, please state the law name, number and date of issuance. Law No. 106 of 2013 on Anti-Money Laundering and Combating the Financing of Terrorism, as amended by Decree-Law No. 76 of 2025, its Executive Regulations, and the Central Bank of Kuwait AML/CFT Instructions.	Yes ☒	No ☐
6. Are all financial institutions in your country subject to AML/CFT laws and regulations?	Yes ☒	No ☐
7. Are non-financial businesses and professions subject to AML/CFT laws and regulations?	Yes ☒	No ☐
8. Does your regulator require you to conduct Customer Due Diligence (CDD) on your customers before conducting any business with them?	Yes ☒	No ☐
9. Does your regulator require you to verify the identity of your customers and apply AML/CFT controls in line with internationally accepted standards?	Yes ☒	No ☐
10. Does your regulator require you to have effective controls in place to prevent and detect proceeds of crime being laundered through your institution?	Yes ☒	No ☐
11. Does your regulator require you to report suspicious transactions to a law enforcement or other agency designated for that purpose?	Yes ☒	No ☐
12. Do the laws and regulations in your jurisdiction permit the opening or maintenance of anonymous or numbered accounts?	Yes ☐	No ☒
13. Do the laws and regulations in your jurisdiction permit conducting business with shell banks?	Yes ☐	No ☒
14. Has your regulator issued instructions covering AML/CFT?	Yes ☒	No ☐
Do these instructions cover all FATF Recommendations?	Yes ☒	No ☐
15. Does your regulator conduct off-site and on-site supervision of your institution covering AML/CFT?	Yes ☒	No ☐
16. Has your regulator or any other authority published guidance and/or lists of individuals or entities known or suspected of money laundering or terrorist financing?	Yes ☒	No ☐

D – General AML/CFT Policies, Practices and Procedures	Yes	No
17. Have you developed written policies and procedures covering all legal and regulatory requirements?	Yes ☒	No ☐
18. Are your AML/CFT policy and procedures approved by your Board of Directors or a senior committee?	Yes ☒	No ☐

D – General AML/CFT Policies, Practices and Procedures	Yes	No
19. Do your policy and procedures document the processes in place to prevent, detect and report suspicious transactions?	Yes ☒	No ☐
20. Do your policy and procedures prohibit disclosing to a customer or any third party that a suspicious transaction report has been, or may be, filed (tipping-off)?	Yes ☒	No ☐
21. Do you have a whistleblowing policy that enables employees to report concerns confidentially and without retaliation?	Yes ☒	No ☐
22. Have you been fined or censured for a breach of AML/CFT legislation?	Yes ☐	No ☒
23. Do you have a written compliance programme that includes a designated AML Officer / Compliance Manager?	Yes ☒	No ☐
24. In addition to inspections by your regulator, do you have an internal audit function or other independent third party that assesses AML/CFT policies and practices on a regular basis?	Yes ☒	No ☐
25. Do you have procedures to establish a record for each new customer, ensuring they are properly identified and their identification documents and CDD information are recorded?	Yes ☒	No ☐
26. Do you identify, and take reasonable measures to verify, the beneficial owner(s) of all customers, including the ownership and control structure of legal persons and legal arrangements?	Yes ☒	No ☐
27. Does your policy cover relationships with the following:	Yes ☒	No ☐
a. Politically Exposed Persons (PEPs), their family members and close associates?	Yes ☒	No ☐
b. Money Services Businesses (MSBs) that are not authorized by the competent authorities?	Yes ☒	No ☐
28. Does your policy require that all your correspondents are licensed to conduct correspondent banking activities and are supervised and regulated by competent authorities?	Yes ☒	No ☐
29. Do you have any correspondent relationships with shell banks?	Yes ☐	No ☒
30. Does your correspondent banking policy address nested (downstream) correspondent relationships and payable-through accounts?	Yes ☒	No ☐
31. Are your AML/CFT policies and practices applied to all your branches and subsidiaries, both in the home country and outside that jurisdiction?	Yes ☒	No ☐
32. Do you have systems and controls in place to screen customers and transactions deemed to be of significantly high risk (including persons, entities or countries) against lists issued by governmental/international bodies and competent authorities?	Yes ☒	No ☐

E – Sanctions & Proliferation Financing	Yes	No
33. Do you have a sanctions policy approved by your Board of Directors or a senior committee?	Yes ☒	No ☐
34. Do you screen customers and transactions against United Nations Security Council sanctions lists and the State of Kuwait national list of designated persons and entities?	Yes ☒	No ☐
35. Upon a confirmed match, do you freeze funds without delay and report to the competent authority, in line with Law No. 106 of 2013 as amended by Decree-Law No. 76 of 2025?	Yes ☒	No ☐
36. Does your institution assess and mitigate proliferation financing risk (financing of weapons of mass destruction)?	Yes ☒	No ☐

F – Transaction Monitoring	Yes	No
37. Do you have policies or practices for identifying and reporting transactions that are required to be reported to the authorities?	Yes ☒	No ☐
38. Do you report cash transactions exceeding a regulatory threshold to the regulatory/competent authority?	Yes ☒	No ☐
39. Do you report wire transfers exceeding a regulatory threshold to the regulatory/competent authority?	Yes ☒	No ☐
40. Where cash transaction reporting is mandatory, do you have procedures to identify transactions structured to avoid such obligations?	Yes ☒	No ☐
41. Does your policy cover transactions for walk-in customers, and do you obtain a valid ID from such customers prior to conducting business?	Yes ☒	No ☐
42. Do your wire transfers include the required originator and beneficiary information (including name, account number and address) in line with FATF Recommendation 16, and do you have procedures to detect incoming transfers with missing or incomplete information?	Yes ☒	No ☐
43. Do you have a monitoring programme for unusual and potentially suspicious activity covering funds transfers and monetary instruments?	Yes ☒	No ☐

G – Risk Assessment	Yes	No
44. Do you have policies for risk-rating customers from a compliance perspective?	Yes ☒	No ☐
45. Do you have a risk-based assessment of your customer base and their transactions?	Yes ☒	No ☐
46. Do you have a documented institution-wide ML/TF/PF risk assessment, approved by senior management and updated periodically?	Yes ☒	No ☐
47. Do you determine the appropriate level of enhanced due diligence for those categories of customers and transactions that you have reason to believe pose a heightened risk of illicit activity?	Yes ☒	No ☐

G – Risk Assessment	Yes	No
48. Do you assess your customers' AML policies or practices (where applicable)?	Yes ☒	No ☐
49. Do you have a process to review and, where appropriate, update information relating to high-risk customers?	Yes ☒	No ☐
50. Do you retain customer and transaction records for at least five years after the end of the relationship or the transaction, in compliance with applicable law?	Yes ☒	No ☐
51. Do you have a risk-based assessment to understand the normal and expected transactions of your customers and to confirm the legitimacy of their business?	Yes ☒	No ☐
52. Do you have procedures for preventing, identifying and reporting suspicious transactions?	Yes ☒	No ☐
53. Does your risk assessment policy cover transactions involving high-risk and non-cooperative jurisdictions (as identified by FATF)?	Yes ☒	No ☐
54. Does your risk assessment policy cover the risks associated with your products and services?	Yes ☒	No ☐
55. Does your risk assessment cover risks arising from new products, delivery channels and technologies prior to their launch?	Yes ☒	No ☐
56. Do you apply enhanced due diligence to high-risk transactions?	Yes ☒	No ☐
57. Do you apply simplified due diligence to low-risk customers?	Yes ☒	No ☐

H – AML/CFT Training	Yes	No
58. Do you provide mandatory AML/CFT training to your employees (including Board members)?	Yes ☒	No ☐
59. Do you organise AML/CFT training and awareness sessions/courses for your staff annually?	Yes ☒	No ☐
60. Does your training/awareness programme address the following: • Identification and reporting of transactions that must be reported to government authorities; • Examples of different forms of money laundering involving your products and services; • Internal policies to prevent money laundering and terrorist financing.	Yes ☒	No ☐
61. Do you communicate new AML/CFT laws, or changes to existing AML/CFT policies, to relevant employees?	Yes ☒	No ☐
62. Do you retain records of your training sessions, including attendance records and the training materials used?	Yes ☒	No ☐

I – FATCA & CRS	Yes	No
63. Are you FATCA compliant or in the process of becoming compliant? If “Yes”, please provide you’re GIIN. GIIN: 7SYKUR.00000.LE.414	Yes ☒	No ☐
64. Have you completed Form W-9 (US entity) / W-8BEN-E (non-US entity)? https://www.irs.gov/forms-instructions	Yes ☒	No ☐
65. Do you comply with the OECD Common Reporting Standard (CRS)?	Yes ☒	No ☐

Additional information (if applicable)

To be completed by an Authorized Signatory

Name	Abdulaziz Mustafa Ali
Title	Head of AML & CFT Department
Signature	 
Date	October 20, 2026