

NATIONAL BANK OF YEMEN
AML / CFT / KYC QUESTIONNAIRE FOR FINANCIAL INSTITUTIONS

In order to comply with the regulator Central Bank of Yemen and as a part of global compliance with Anti Money Laundering and Countering Financing of Terrorism policies and procedures all financial institutions are required to complete this questionnaire which to be completed and dully signed by an authorized person.

SECTION (1) - GENERAL INFORMATION		
1	Name of Institution	National Bank of Yemen
2	Legal Status	Financial Institution
3	Banking License No.	A02/0101/2863
4	Country of Incorporation	Republic of Yemen – Aden Governorate
5	Registration Number	1748
6	Date of Registration	31.December.2024
7	Address of Head Office	P. O. Box : 5, Crater , Aden - Republic Of Yemen
8	Website Address	www.nbyemen.com
9	Major Business Activities	Commercial
10	Compliance Officer Contact :	
	Name :	Faisal Mohsen Mohsen Al-Soudi
	Position :	Head of Compliance Unit
	Telephone :	+967 02 265077
	Fax :	+967 02 395162
	E-mail Address :	ml-unit@nbyemen.com
11	Name of the Financial Banking Regulatory in your country	Central Bank of Yemen - Aden
12	Name of the Regulatory Authority for AML and suspicious	FIU - Aden

13	Name of Branches : Domestic : Foreign (if any) :	Available on the website N/A All bank branches domiciled within Yemen only and have no presence outside Republic of Yemen.
14	Please provide most recent annual report	Available on the website
15	Please Provide a list of major shareholders holding more than 10% shares in your institutions	The bank is a State Owned Entity under the supervision of the minister of finance and has no shareholders.
16	Current list of Members of the Board of Directors	Available on the website
17	Current List Board of Directors	Available on the website
18	Current List of Top Level Management	Available on the website
19	Number of Employees	950
20	Purpose of the business relationship	Trade Finance
21	How many customers does your institution have?	120, 274

SECTION (2) - CLIENT BASE

22	Does your institution provide financial services to any of the following customer :	
	MSB / MVTs customers	No
	Cash Intensive Business	No
	Casinos	No
	Non – account customers	No
	Unregulated Charities	No
	Nuclear Power	No
	Payment Service Providers	No
	Red Lights Business	No
	Arms , Defense , Military	No
	Marijuana – related entities	No

SECTION (3) - RISK ASSESSMENT

23	Does the financial Institution have a risk assessment methodology to assess the AML by its customers and their transactions?	Yes
24	What factors are used by the financial institution to determine risk classification?	The bank recently implemented in corporation with Bio Tech Solutions – The Hasemite Kingdom of Jordan a RBA system in order to classify clients by a risk ranking (High , Medium , Low) which collects customers data to detect potential risk whether they are individuals or entities.

SECTION (4) - AML / CFT AND PROCEDURES

25	Is the AML / CFT Compliance program approved by the Financial institutions Board or Committee?	Yes
26	Has your country establish laws to prevent AML and CFT?	Yes
27	Are your laws consistent with FATF Recommendations?	Yes
28	Has your financial institution developed written policies and implemented internal procedures and controls to prevent, detect and report suspicious transactions?	Yes
29	Does your financial institution have an internal audit function that assesses AML / CFT policies and practices on a regular basis?	Yes
30	Does your policy prohibiting accounts / relationships with shell banks?	Yes
31	Does your financial institution have policies ensure that they will not conduct transactions with or behalf of shell banks through any of its accounts or products?	Yes

32	Does your financial institution have policies ensure that they will not conduct transactions with or behalf of shell banks through any of its accounts or products?	Yes
33	Does your financial institution maintain payable through accounts?	No
34	Does your financial institution maintain nested accounts?	No

SECTION (5) - KYC , CDD AND EDD

35	Has the financial institution implemented a systems for the identification of its customers, including customer information in the case of recorded transactions account opening for example name, nationality , street address , telephone number , occupation , age / date of birth , number and type of valid official identification and the home of the country / state that is issued it ?	Yes
36	Does the financial institution have a CDD and EDD program to identify and verify identity?	Yes
37	Who is responsible for KYC during on boarding and review?	Branches customer services officers
38	Is the KYC process centralized or conduct by branches? If conducted by branches, is there centralized review or approval?	It is implemented through branches and reviewed by the liaison officers at branches and opening account is approved by the branch managers. All bank's branches also conduct and follow enhanced due diligence procedures for customers flagged as high risk based on risk-scoring methods and one of the procedures includes requires senior management approval for establishing or continuing the business relationship.
39	Does the financial institution monitor clients for sanctions entities and countries before entering in business relationship?	Yes



40	Does the financial institution have a process to review and update customer information relating to high risk client information, adverse information screening and SAR?	Yes
41	Does the financial institution have RBA to screening customer to determine whether they are PEPs or controlled by PEPs?	Yes
42	Does the financial institution have policies, procedures and process to review from screening customers to determine whether they are PEPs or controlled by PEPs?	Yes
43	Does the financial institution identify the UBOs of its customers?	Yes
44	Does the financial institution review and update customer information based on KYC renewal, trigger event?	Yes
45	Does the financial institution have a policy of protecting employees who report in good faith any suspicious transactions / activities?	Yes
SECTION (6) - SCREENING AND SANCTIONS COMPLIANCE		
46	Does the financial screen its customer database against proscribed lists? if yes, please name lists the financial institution uses?	Yes
47	Does the financial institution have sanctions policy approved by management?	Yes
SECTION (7) - TRANSACTIONS MONITORING REPORT		
48	Does the financial institution have policies for the ID and reporting transactions that are required to report to authorities?	Yes
49	Does the financial institution have a monitoring process to detect suspicious transactions? If yes, is this process to manual or automated, if	Yes



[Handwritten signature]

	automated please provide vendor?	
50	Does the financial institution pay attention to high risk customers?	Yes
51	Does your financial institution report any suspicious transactions in the past year?	Yes
SECTION (8) - AML TRAINING		
52	Does the financial institution provide AML Training to relevant employees?	Yes
53	Does AML Training includes : - Identification and reporting transactions that must be reported to government authorities. - Examples of different forms of ML involving the financial institutions product and services. - Internal policies to prevent ML.	Yes Yes Yes
54	Does the financial institution retain records of its training sessions including attendance records and relevant training material used?	Yes
55	Does the financial institution communicate new AML related laws or changes to existing AML related policies or practices to relevant employees?	Yes
56	Does the financial institution employ third parties to carry out some of the functions of the financial institutions? If yes, Does AML training includes some material provided to relevant employees?	Yes

I hereby confirm that to the best of my knowledge the statements given above are true and correct as well as I confirm that I am authorized to complete this document.

Name : Faisal Mohsen Mohsen Al-Soudi

Title : Head of Compliance Unit



Signature :



Date : 21. November .2024