

Sanctions Assessment Questionnaire

By submission of this document, the client confirms that to the best of its knowledge, the information provided is true and bonafide. Notwithstanding the on-boarding of the subject client, Mashreq may solicit transaction related information at any point and reserves the right to decide if the transaction will be permissible as per its policy and risk appetite.

Corporate Legal Entity Assessment

The purpose of this form is to best identify and assess the nature of any subject exposure. Please answer the questions set out in Section 1 for the Legal Entity, where answering "YES" further elaboration is required.

Date | d | d | m | m | y | y | y | y |

Client Group Name: _____

Legal Entity Name: _____

Line of Business: _____

Country of Incorporation: _____

CIF Number: _____

Branch Location (where applicable): _____

This form is required to be completed by the client or it's legal representative or relationship manager (rm) on it's behalf and signed by the client or it's authorized/nominated signatory¹

Section 1:

- To the best of your knowledge does the company have any current or planned business activities² [Business activity includes operations, suppliers, customers, agents, origin of goods or shipping route and interactions/exposure to state owned or controlled entities.]/ transactions / dealings with or involving, directly or indirectly, parties which are currently targeted by sanctions administered by the following bodies: UN, EU, UKHMT, OFAC, or any other local sanctions such as the UAE regulatory authorities?

If question 1 section 1 is answered YES pls answer question 1 section 2

If "Yes", please provide below information:

- Legal name of the sanctioned party(ies) with which the client has current or planned business activity / transactions / dealings.
The nature of the current or planned business activity / transactions / dealings, including the currency and parties involved and the % of the client's revenues that are generated through this activity.
- What is the extent of Mashreq's role in the business activity / transactions / dealings.

Yes No

- To the best of your knowledge, does the company have any current or planned business activity² [Business activity includes operations, suppliers, customers, agents, origin of goods or shipping route and interactions/exposure to state owned or controlled entities.] / transactions / dealings in, with or involving, directly or indirectly, the following countries/regions. **Iran, North Korea, Syria, Cuba, Crimea, Donetsk, Luhansk, Kherson and Zaporizhzhia?**

If "Yes", please provide below information:

- A description of the specific business activity / transaction / dealings with or involving each of the above-referenced countries/territories, including the currency and counterparties involved.
- What is the extent of Mashreq's role in the above business activity / transactions / dealings.

Yes No

- To the best of your knowledge, does the company or any of its connected parties have a branch, subsidiary, joint venture or other operations in **Iran, North Korea, Syria, Cuba, Crimea, Donetsk, Luhansk, Kherson and Zaporizhzhia?**

If "Yes", please provide below information:

- A description of the specific business activity / transaction / dealings with or involving each of the above-referenced countries/territories, including the currency and counterparties involved.
- What is the extent of Mashreq's role in the above business activity / transactions / dealings.

Yes No

¹All natural Persons or Entities associated with a Customer or prospective Customer that must be identified under the AML Policy and related Standards and local Business procedures. Examples include: key officials (e.g. Chief Executive Officer, Chief Operating Officer, Chief Finance Officer); partners; directors; Authorized Representatives and those having the right to appoint Authorized Representatives; authorized signatories including secondary card holders; settlors; controllers, executors, direct or indirect Owners (including any Ultimate Beneficial Owners) and a holder of a power of attorney.

²Business activity includes operations, suppliers, customers, agents, origin of goods or shipping route and interactions/exposure to state owned or controlled entities.

4. Russia

- a. To the best of your knowledge, does the company have any current or planned business activities / transactions / dealings in, with or involving, directly or indirectly, Russia.

Yes No

- b. To the best of your knowledge does the client conduct or enable, directly or indirectly, the following activities from/ to Russia:

- Import / export goods
- Acquire / provide services.

- i. Please provide a description of the nature of the current or planned Russia-related business activities / transactions / dealings, including the currency and the name of the parties (including the Russian entities) involved.
- ii. List of products (preferably the HS Codes) and services that the client is dealing in related to Russia.
- iii. Please list the annual percentage contribution related, directly or indirectly, to Russia-related business
 - Total expenses/purchases or
 - Revenue /sales /assets

Yes No

- c. To the best of your knowledge, does the company have any direct or indirect business activity (current or planned) and/or connected parties linked with an SSI target³.

If "Yes", please provide summary of this activity, including (Legal Name of SSI target, percentage of exposure, how is the activity funded and transactions undertaken (including banks and currencies), ownership details and what is the extent of Mashreq's role in the above exposure / transaction activity.

Yes No

- d. To the best of your knowledge does the client have exposure to Deep-water⁴, Artic offshore or shale project(s) that have the potential to produce oil anywhere in the world?

Yes No

If any question is answered YES pls answer question 3 section 2

5. SUDAN (North)

- To the best of your knowledge, does the company have any direct or indirect business activity / transactions / dealings (current or planned) related to Sudan (North) and/or does the company or any of its connected parties have a presence in Sudan (North)?

If "Yes", please acknowledge your understanding that transactions / business activities / dealings relating to Sudan (North) where there is any US element such as but not limited to; USD, US territory or person⁵, US owned / controlled entity or US origin goods are not permissible as per Mashreq policy:

- i. Please provide a description of the nature of the current or planned business activities / transactions / dealings involving these countries, including the current and names of the counterparties involved as well as the % of the client's revenues that are generated through this activity.
- ii. What is the extent of Mashreq's role in the above exposure / transaction activity?

Yes No

6. To the best of your knowledge, does the company have any direct or indirect business activities / transactions / dealings (current or planned) involving the export/import of Dual-Use goods⁶, sensitive goods, controlled goods, military goods, etc.?

If "Yes", please provide appropriate permits issued and confirm the following:

- i. Detailed description of goods or services.
- ii. List of goods and/or HS Code number of the goods or services.
- iii. Full names and addresses of the end-users of the Dual-Use goods/services.
- iv. What is the specific end-use of the Dual-Use goods?
- v. Are the goods intended for ultimate use that may be offensive in nature?
- vi. Final destination of goods or final location of services.

Yes No

³Entities that are the target of sectoral Sanctions administered by EU or OFAC under the Russia/Ukraine Sanctions Programme.

⁴Deep water is defined as depth of 500ft or greater.

⁵US persons* include anyone in the United States; any US citizen or green card holder, wherever located; any US entity, or anyone employed by and acting for an US entity.

⁶Dual - use goods are items that can be used both for civilian and military application.

7. To the best of your knowledge, does the company have any current or planned business activity / transactions / dealings in, with or involving, directly or indirectly, or are any of the client's suppliers/buyers located in the following countries/regions?

Afghanistan, Armenia, Turkmenistan, Uzbekistan, Azerbaijan, Kazakhstan, Kyrgyzstan, Tajikistan and South Sudan, Ukraine, Venezuela, Belarus and/or Myanmar ?

If "Yes", please provide below details:

- i. What is the specific business activity related to the above listed countries
- ii. Legal name of the individuals/ entities that the client is engaging in its business activity dealing with either directly or indirectly in the specific countries.
- iii. How is the client conducting financial transactions related to the specific parties in point. Please provide the bank and currency details?
- iv. What is the mode and route of transportation of goods to/from the specific countries in the below table?
- v. What is the extent of Mashreq's role in the below exposure / transaction activity?
- vi. What is the extent of Mashreq's role in the above exposure / transaction activity?

Yes No

Completion Details

The account Holder/Client hereby acknowledges that Mashreq, as a global financial institution, complies with applicable international and local anti-money laundering, counter terrorist financing, financial sanctions laws, regulations, policies and requirements. This means that Mashreq has adopted tighter controls that can limit its business activity. The increased controls have been adopted across the Group and are not targeted at the Account Holder/Client.

The Account Holder/Client undertakes that under no circumstance shall it route business activity, directly or indirectly relating to any person or entity (whether or not related to any of them) which is currently listed on a Sanctions List, through any of its account(s) maintained with Mashreq.

The account Holder/Client undertakes that under no circumstance, shall **Iran, North Korea, Cuba, Syria, Crimea Donetsk, Luhansk, Kherson and Zaporizhzhia regions (restricted countries/regions)** related business activity, directly or otherwise, be routed through any of its account(s) maintained with Mashreq. This undertaking equally applies to business activity relating to Sudan (North) where there is any US element such as but not limited to; USD, US territory or person*, US owned / controlled entity or US origin goods. Business activity includes, but is not limited to:

- Trade and trade related transaction(s), including but not limited to: shipments/trans shipments (import/export, insurance / re-insurance, etc.)
- Payments including local and cross-border remittances.,
- Dealings with governments or financial institutions/persons/entities determined to be affiliated with or acting on behalf of the governments of any of the above listed countries / regions.

The Account Holder/Client therefore acknowledges and accepts that Mashreq retains the right to review the relationship in light of its risk appetite and terminate the relationship (with the Account Holder/Client and/or any of the Account Holder/Client sister companies/joint ventures/ affiliates) should any business activity, directly or otherwise, relating to restricted countries/ parties/ activities be conducted through any of its Mashreq Bank account(s).

The Account Holder/Client confirms that it is committed to and shall promptly notify Mashreq of any deviation in the above declared business activity which may occur on account of its business decision. (Example: Establishment of direct or indirect business links with a jurisdiction that is not already declared in this document).

The Account Holder/Client confirms that it is committed to and shall fully comply with all applicable international sanctions (including EU, UAECB, UKHMT, UN and US) and upon its knowledge of any breach, potential breach or circumvention attempt it shall immediately notify Mashreq of the same.

The Account Holder/Client confirm that it will not use its account(s) at Mashreq for business activity on behalf of undisclosed third parties.

The Account Holder/Client confirm that no transactions also include not undertaking licensed and/or permissible transactions through Mashreq.

I/We confirm that this Questionnaire has been signed by _____ (name of the person) who holds position of _____ in the company and that all information is correct and true at the time of responding and is authorized to provide such certifications / undertakings.

Signature: _____

Name of the Person: _____

Designation: _____

Date

FOR BANK USE ONLY:

Completion Details

Business:

I confirm that this Questionnaire has been verified and signed by –

Signature:

Name of the Person:

Designation:

Date [d | d | m | m | y | y | y | y]

Embedded Compliance Function:

The customer declaration in this questionnaire has been reviewed along with the KYC information/ documents provided by the customer.

Signature:

Name of the Person:

Designation:

Date [d | d | m | m | y | y | y | y]

Section 2: To be completed if any question in section 1 is answered "YES"

1. To the best of your knowledge are any of the company's connected parties¹ currently targeted by sanctions administered by the following bodies: UN, EU, UKHMT, OFAC, or any other local sanctions such as the UAE regulatory authorities?

If "Yes", please provide below information:

- i. Legal name of the sanctioned party(ies)*
- ii. The nature of association of such sanctioned party(ies) with the client*
- iii. Does the client conduct transactions on behalf of the sanctioned connected party? If so, please provide details*

Yes No

2. Russia

a. To the best of your knowledge does the company have New Investment or planned new investment related to Russia.

If "Yes" to points a:

- iv. Please provide a description of the nature of the current or planned Russia-related business activities / transactions / dealings, including the currency and the name of the parties (including the Russian entities) involved.*
- v. List of products (preferably the HS Codes) and services that the client is dealing in related to Russia.*
- vi. Please list the annual percentage contribution related, directly or indirectly, to Russia-related business*
 - *Total expenses/purchases or*
 - *Revenue /sales /assets*

Yes No

b. To the best of your knowledge, is the company owned or controlled by, or acting on behalf of an individual, entity or organization that is, or whose connected parties are, resident or domiciled in Russia.

If "Yes" to points b:

Please provide details, including the legal Name of any connected parties that are resident or domiciled in Russia, the ownership details of such parties, description of the business activities / transactions / dealings undertaken on behalf of such parties (including banks and currencies), and what is the extent of Mashreq's role in the above exposure / transaction activity

Yes No